

Equality Impact Assessment

Section 1: Initial Screening

Department	Bus Reform Programme
Team or Service Area leading the analysis	As above
Officer completing the analysis	Draft published for consultation Oct 2019: Nick Hallett, Muhammad Karim Updates following first and second consultations: Donna Cooper, Josh Makin, Nick Mills, Emma Flinn
Phone	N/A
Email	Various

Type of activity	Programme
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Analysis Reference	Bus Franchising in Greater Manchester Assessment
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In accordance with s149(1) of the Equality Act 2010, Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) are required in the exercise of their functions to have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not share it.
- Foster good relations between those who have a relevant protected characteristic and those who don't.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of the persons who do not share it;
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

"Relevant protected characteristics" are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

As part of its compliance with this ongoing duty, TfGM undertakes an Equality Impact Assessment (EqIA) for any significant strategy, project, policy, process or procedure using a standard screening form designed to identify any adverse impacts on members of the above "protected characteristic groups" and to record actions planned to ameliorate any adverse impacts, should any be identified.

In reading the following EqIA screening form for proposals to introduce franchising in Greater Manchester, which has been undertaken by TfGM on behalf of GMCA, it should be borne in mind that the document was written for internal use rather than for publication. It is reproduced here as a record of TfGM's consideration, on behalf of GMCA, of the anticipated impact of bus franchising on members of the protected characteristic groups listed above.

Question 1:

Is this a new or existing activity?

New

Question 2:

What is the main aim and purpose of the activity?

On 30 June 2017, GMCA decided to use the powers available in the Transport Act 2000 (as amended by the Bus Services Act 2017) ("the Act") to prepare an assessment of a proposed franchising scheme, which included a comparison against other options for bus reform in Greater Manchester.

The objectives of improving the bus network in Greater Manchester are set out in GMCA's Greater Manchester Transport Strategy 2040 and the Vision for Bus. In summary, those objectives included network integration, a simpler and integrated fares system, a consistent customer experience and value for money.

In carrying out the assessment, TfGM were required to identify a number of options that have the potential to achieve the objectives for bus reform, before then considering a shortlist of three realistic options. These options were:

1. a 'do nothing' option;
2. a partnership (such as what was being proposed by operators and/or a stronger partnership which included the introduction of an enhanced partnership scheme); and
3. a franchising scheme.

Under the proposed franchising scheme, TfGM (on behalf of GMCA) would set the routes, timetables, fares and standards for bus services in GM. The bus companies would competitively bid for contracts in order to run services on GMCA's behalf.

At its meeting on 7 October 2019, having completed its assessment and having received a report from an independent audit organisation on that assessment as required by the Transport Act 2000, GMCA decided that it wished to proceed with its proposed franchising scheme and therefore resolved to conduct a consultation 'the first consultation' in accordance with section 123E of the Act. This consultation ran between 14 October 2019 and 8 January 2020.

In June 2020 TfGM completed its *Bus Franchising in Greater Manchester June 2020 Consultation Report*, which contained TfGM's review of those consultation responses. However, neither the first consultation nor the Assessment took into account any of the possible impact and effects of Covid-19 on the bus market in GM.

As such, at its meeting on 26 June 2020 GMCA decided that before any decision on whether or not to introduce the Proposed Franchising Scheme could be made, consideration needed to be given to the impacts that Covid-19 may have on the bus market in GM. As a result of this TfGM produced a *Covid-19 Impact on Bus Franchising Report* ("the Covid-19 Impact Report"). The Covid-19 Impact Report was not intended on being another assessment in the context of section 123B of the Act. Instead it considered the potential impacts of Covid-19 against four potential scenarios which were developed to help illustrate what the bus market may look like in the future

At its meeting on 27 November 2020, GMCA decided to undertake a further consultation ('the second consultation') on its Proposed Franchising Scheme. The purpose of this consultation was to allow

consultees to provide their views on the Assessment (in light of the findings of the Covid-19 Impact Report) and to provide their views on whether or not the Proposed Franchising Scheme should be introduced. Consideration was also given on the partnership options which operators had previously put forward in response to the first consultation.

The second consultation ran between 2 December 2020 and 29 January 2021. TfGM has now completed its report on the second consultation: TfGM's March 2021 Consultation Report. The matter will now be considered by the GMCA.

Question 3:

List the main elements of the activity?

In preparing its assessment, TfGM was required to comply with various legal requirements as set out in the Act. This included but was not limited to setting out the effects the proposed scheme is likely to produce and also included comparing making the proposed scheme to one or more other courses of action.

The Act (through the relevant statutory guidance) also required the assessment to take the form of a five-case business case model which includes Strategic, Financial, Commercial, Management and Economic Cases. As well as requiring an assessment to be prepared, the Act sets out the other procedures that are required before a decision can be made to make a proposed scheme. This includes but is not limited to having to obtain an independent audit on its assessment, undertaking a public consultation on the assessment and publishing a report setting out the authority's response to the consultation.

As explained above, further work, including the Covid-19 Impact Report and a review of it by an independent auditor, and a second consultation has now been undertaken to consider the possible impacts of Covid-19 on the bus market.

Question 4:

If this is a new / proposed activity or a change to an existing activity please explain why the proposal is being made / for what reason?

Since 1986 bus services in Greater Manchester have been deregulated. That means the buses are run by commercial bus companies who decide the routes, timetables, fares and standards. The bus companies receive the revenue from fares and retain the profits. At times of the day and in areas where there is a social need, GMCA pays operators to run services on those routes. These are known as subsidised services. Around 20% of services would not run if not for GMCA's intervention. Bus services would continue to be provided in the Greater Manchester area under any bus franchising proposals albeit under different arrangements. The introduction of a bus franchising scheme would, for the purposes of this assessment, amount to a new activity.

Question 5:

What outcomes does the activity aim to achieve?

A franchising scheme would involve the authority specifying the routes, frequencies, fares and standards for the bus services which operators would then bid to run on the authority's behalf under contract. This is a change to the current deregulated market where operators are able to run services at their own discretion, subject to obtaining sufficient operating licences from the traffic commissioner.

As set out in the Assessment, it is presently anticipated that the franchising scheme would, if introduced, allow for the development of a more effective bus network. This would, for example, allow for a simplified ticket offer for passengers, a single and consistent brand for buses and a single point of contact for passengers. It would also allow, over time, the bus network to be integrated more closely with other modes of transport, such as rail and tram and provide better value for money for the public purse.

Question 6:

Who are, or will be, the main beneficiaries of the activity?

Please tick one or more of the following

Travelling public	Yes
TfGM staff	No
Partners including Operators	See below
Suppliers	Yes
Others – please specify	<p>It is presently anticipated that the travelling public, partners and suppliers would benefit for the following reasons:</p> <ul style="list-style-type: none"> • More convenient and affordable buses would open up a wider range of employment opportunities to job seekers and, by the same token, give businesses a better choice of employees; they would also make it easier for people to get to schools, colleges, hospitals, doctors' surgeries, shops and leisure activities. • By making a contribution to the overall attractiveness of Greater Manchester as a place to live and do business, franchising would make it more likely that businesses would choose to locate in Greater Manchester, which would bring economic benefits to Greater Manchester and its residents. • It is anticipated that franchising could provide long-term stability of the bus market. <p>The impacts on bus operators of the Proposed Franchising Scheme are considered in;</p> <ul style="list-style-type: none"> • The Assessment • The Covid-19 Impact Bus Franchising Report • TfGM's March 2021 Consultation Report

Question 7:

Do you need to consult with people who might be affected by it directly or indirectly? Please justify your response

Section 123E of the Act states that if after obtaining an audit report as required by section 123D the GMCA wish to proceed with the proposed franchising scheme, it is required to undertake a consultation. This means that the GMCA would be required to:

- publish a consultation document (which amongst other things must describe the proposed scheme);
- publish the assessment of the proposed scheme;
- publish the auditor's report as required by section 123D; and
- give notice of the proposed scheme as appropriate for bringing it to the attention of persons in the relevant area.

In addition to the above, the Act also sets out who must be consulted and how an authority is also required prepare a report setting out its response to the consultation. In terms of who must be consulted, this includes bus operators who operate local services in the area to which the proposed scheme relates.

The first consultation ran between 14 October 2019 and 8 January 2020.

For the reasons described above, following the Covid-19 Impact Report, the second consultation was undertaken between 2 December 2020 and 29 January 2021.

Question 8:

Having due regard for the equality duty involves: Removing or minimising disadvantages suffered by people due to their protected characteristics; Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. Please complete the table below and give reasons, evidence and comment, where appropriate, to support your judgement(s).

Use the table below to record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups. Use the table below to record where you think that the activity could have an adverse impact on any of the equality target groups i.e. it could disadvantage them and impact is high. - Use the last column in the table below to give reason/comments/evidence where appropriate to support your judgement.

Age			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Children and Young People (aged 19 and under)	High		<p>(1) Under the Proposed Franchising Scheme all bus services, with a few exceptions, would be under the control of GMCA – whereby TfGM on behalf of GMCA would set routes, timetables, fares and standards. This would allow GMCA to fully integrate buses with the rest of the public transport network and more effectively plan for a network that supports economic growth and meets the future needs of the city-region. This also means that impacts on those with protected characteristics would be duly considered in any future decision making. As such, TfGM as the single body responsible for the specification, quality assurance and promotion of bus services in GM on behalf of GMCA would be in a better position than at present to address the needs of this group and to ensure they are aware of travel opportunities provided by bus services.</p> <p>Children and Young People have a more limited ability to travel independently without public transport than most other demographic groups.</p> <p>TfGM’s travel diary survey (GM TRADs) years 6,7,8 (2017-2019) shows a higher proportion of bus users amongst people aged 19 and under compared to the GM average.</p> <p>Qualitative Transport Focus research with young people has found that complexity of ticketing and timetabling is a key barrier that dissuades some young people from using the bus to travel independently (Using the bus: what young people think, Transport Focus 2018).</p> <p>Children and young people will therefore benefit to a greater degree than average from the benefits of franchising.</p>

Older People (aged 60 and over)	High		<p>The above comments (1) also apply to this group.</p> <p>GM TRADs years 678 shows slightly higher than average proportion of bus users amongst people aged 60 and over. A retired person with no access to a car is over twice as likely than average to regularly use buses (GM Segmentation – Insights into bus use, Steer Davies Gleave, 2018).</p> <p>Under a Franchising Scheme Older people will therefore benefit to a greater degree than average from the benefits of franchising (apart those related to fares, where the impact is largely neutral since most of this group already travel free after 0930 on weekdays and all day at the weekends).</p>
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Disability

Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People with physical impairments (includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user)	High		<p>The above comment (1) also applies to this group.</p> <p>GM TRADs (TRADs years 678) shows a slightly higher proportion of bus users amongst people with a physical impairment compared to those with no disability or impairment.</p> <p>(2) Analysis of the GM Bus Passenger Survey (2016) found that disabled respondents (with a range of disabilities) were more likely to be reliant on buses and travel on buses due to a lack of other options, than other respondents (Bus Passenger Survey, Transport Focus, 2016).</p> <p>Under a franchising scheme, vehicle specification would be considered in the design of contracts and plans for quality monitoring, and continued consideration of the public sector equality duty shall be given to how such vehicle specifications may impact on those with relevant protected characteristics.</p>
People with communication or sensory impairments (includes blind/partially sighted, deaf/ hard of hearing, difficulty speaking)	High		<p>The above comments (1) and (2) also apply to this group.</p> <p>GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a communication or sensory impairments compared to those with no disability or impairment.</p> <p>(3) The Bus Services Act gives the Secretary of State for Transport the power to create, "for the purpose of facilitating travel by disabled persons", regulations governing the standards of information provided by bus operators, including audio-visual announcements. Following a public consultation on this by the Department of</p>

			<p>Transport in the summer of 2018, it had been expected that these regulations would be made in 2019. Although the regulations have yet to be made, it is expected that they will be in due course and that thereafter those operating bus services (including TfGM on behalf of GMCA under a franchise model) will be required to provide information on-board buses in compliance with those regulations. It is anticipated that these measures would improve the accessibility of buses for those with physical disabilities and those with communication or sensory impairments.</p>
<p>People with a learning disability or cognitive impairment (includes conditions which affect ability to learn, understand, read, remember and concentrate e.g. Down Syndrome, autism, ADA)</p>	High		<p>Comments (1) (2) and (3) above also apply to this group</p> <p>GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a learning disability or cognitive impairment compared to those with no disability or impairment.</p> <p>A more stable bus network specified by TfGM, a single livery for buses and simpler pricing and ticketing may benefit people with a learning disability or cognitive impairment by making the network simpler to use.</p>
<p>People with mental health problems (includes depression, schizophrenia)</p>	Medium		<p>GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a mental health problems compared to those with no disability or impairment.</p> <p>The above comments (1) and (2) also apply to this group.</p>
<p>People with long standing illness/health condition (Includes cancer, HIV, MS, diabetes, heart disease, epilepsy, continence)</p>	Low		<p>GM TRADs (TRADs years 678) shows slightly higher proportion of bus users amongst people with a long-standing illness/health condition compared to those with no disability or impairment.</p> <p>The above comment (1) also applies to this group, although many members of this group may not have needs specifically relevant to bus</p>
<p>Other disability / impairment not covered by any of the above</p>	Low		<p>No groups identified</p>

Sex and gender reassignment			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	Low		The above comment (1) also applies to this group.
Women	Medium		<p>The above comment (1) also applies to this group.</p> <p>GM TRADs years 678, has shown that more women make bus trips than men. Equally, TfGM research has found that women make more trips overall (GM TRADs years 678) and have more activities they rate as important to access than men (TfGM, Access and Inclusion, 2020). Women are also more likely to make regular journeys for more than one purpose, or 'trip chain' than men (TfGM, Segmentation 2017). Women who reject the bus were more likely than men to mention reliability and delays as a reason for doing so. (Sales Funnel, 2019).</p> <p>An integrated network is therefore important for this group and may allow easier 'trip chaining' and access to a range of destinations.</p> <p>Women are more concerned than men about personal security when travelling by bus. Satisfaction with personal security at night was lower amongst women bus users than men in TfGM's Network Principles survey (2018) TfGM's segmentation survey also found that safety was a higher priority for women than men when making transport choices. (GM Segmentation Survey, TfGM, 2017)</p> <p>A franchising scheme would be better equipped to ensure improvements to safety standards across the whole network in a consistent manner, due to the nature of the proposed scheme itself whereby the bus network would be under the sole control of TfGM as opposed to private operators acting independently of one another. Safety and security would be fully considered in the development of plans for the Proposed Franchising Scheme.</p>
Transgender People	Low		The above comment (1) also applies to this group.

Pregnancy and Maternity			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People who are pregnant	Low		The above comment (1) also applies to this group.
People who have given birth in the last 26 weeks	Low		The above comment (1) also applies to this group.
Race			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	Medium		<p>The above comment (1) also applies to this group.</p> <p>GM TRADs (TRADs years 678) shows people from Asian backgrounds have an average level of bus use for GM. Car availability is above average overall in GM, although some Asian backgrounds show lower than average car availability (Census 2011).</p>
Black or Black British Backgrounds (This includes Caribbean, African or any other black background)	Medium		<p>The above comment (1) also applies to this group.</p> <p>GM TRADs (TRADs years 678) shows people from Black or Black British backgrounds in GM are more likely than average to be bus users and are more likely than average to use the bus frequently (five or more days a week). Census figures also show this group are more likely than average to use the bus to access work in GM (Census 2011). People from Black or Black British backgrounds in GM are also less likely than average to have access to a car (Census 2011).</p> <p>(4) Since members of this group are more likely than average to use buses and less likely to have access to a car, they are more likely to depend on bus services than average. To that degree, they may therefore benefit to a greater degree than average from the benefits of franchising.</p>
Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)	Medium		<p>The above comments (1) and (4) also apply to this group.</p> <p>GM TRADs (TRADs years 678) shows people from mixed ethnic backgrounds in GM are more likely than average to be bus users and are more likely than average to use the bus frequently (five or more days a week). In GM, this group is also less likely than average to have access to a car (Census 2011).</p>
White British Background (This includes English, Scottish & Welsh, N. Irish)	Low		The above comment (1) also applies to this group.

			GM TRADs (TRADs years 678) shows people from white British backgrounds in GM have an average level of bus use. Car availability is also average.
Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds, and Irish Gypsy or Irish Travellers)	Medium		The above comments (1) and (4) also apply to this group. In GM, this group are less likely than average to have access to a car (census 2011)
Arabs	Medium		The above comments (1) and (4) also apply to this group. In GM, this group are less likely than average to have access to a car. (census 2011)
Any other ethnic background not covered by any of the above	Low		None identified

Religion/Belief			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists	Low		The above comment (1) also applies to this group.
Christians	Low		The above comment (1) also applies to this group.
Hindus	Low		The above comment (1) also applies to this group.
Jews	Low		The above comment (1) also applies to this group.
Muslims	Low		The above comment (1) also applies to this group.
Sikhs	Low		The above comment (1) also applies to this group.
Others	Low		None identified

Sexual Orientation			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men	Medium		<p>The above comment (1) also applies to this group.</p> <p>(5) The Government Equalities Office National LGBT survey (2018) found that the most common place that people avoided being open about their sexual orientation was on public transport, for fear of a negative reaction from others.</p> <p>A franchising scheme would be better equipped than private operators acting independently of one another to ensure improvements to safety standards across the whole network in a consistent manner.</p> <p>Safety and security would be fully considered in the development of plans for the Proposed Franchising Scheme.</p>
Lesbians	Medium		The above comments (1) and (5) also apply to this group.
Bisexual	Medium		The above comments (1) and (5) also apply to this group.

Question 9:

If this activity involves new build or alteration to existing building, has any consideration been given to provision of a multi-faith room

Not applicable

Question 10:

Have you identified two or more high adverse impacts in the table above

No

Question 11:

If you have identified one high adverse impact or any medium / low adverse impacts, what improvements to the activity would / could you make to mitigate high/medium/low adverse impact? Please give details of the improvements you plan to make

Not applicable

Question 12:

Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on:

The public sector equality duty is an ongoing duty necessitating the need for ongoing self-evaluation and review. This means that if implemented, the effects of the Proposed Franchising Scheme will be carefully monitored to ensure ongoing compliance with GMCA's duties under equality legislation.

Equality Group		Details
Age	N	Not applicable at this stage – appropriate monitoring activity would be considered and developed as necessary should the Proposed Franchising Scheme be implemented
Disability	N	As above
Gender reassignment	N	As above
Pregnancy and maternity	N	As above
Race	N	As above
Religion/Belief	N	As above
Sex	N	As above
Sexual Orientation	N	As above
Other	N	As above

Question 13:

How will you measure the success of this activity? (including any corporate performance measures)

As referenced above, appropriate monitoring activity would be considered and developed as necessary should the Proposed Franchising Scheme be implemented.

Once the Proposed Franchising Scheme is operational it is proposed that GMCA (which is assumed would be TfGM acting on its behalf) would consult organisations representing bus users immediately after the expiry of the first franchise contracts awarded during the transition period, and at other appropriate times, to evaluate how well the Proposed Franchising Scheme is working. GMCA would then report on its response to these consultations. Where appropriate GMCA may consider extending the consultation to include passengers, bus operators and trade unions, local authorities, businesses, elected representatives, the traffic commissioner, the police, the Competition and Markets Authority and those with protected characteristics (e.g. representatives of disabled people such as the TfGM Disability Design Reference Group)

Question 14:

In question 10 above you may have outlined improvements to the activity which will mitigate a high, medium and/or low adverse impact(s). How will you ensure that everyone involved in the activity knows and understands what improvements you intend to make and is able to put the activity into practice with those improvements?

Not applicable

Question 15:

Are there any elements within this activity that require a separate Equality Impact Analysis?

No

Question 16:

Please confirm that during the implementation of this activity, where appropriate, TfGM's corporate strategies and procedures will be followed. If your answer to any of these questions is 'no' explain why you will not be following the strategy or procedure.

Strategy / Policy		Details
Communication with members of the public – TfGM’s Corporate Communications Strategy will be followed	Yes	Should the Proposed Franchising Scheme be made, communication about any changes to the bus system will be clear and accessible to all.
Procurement - TfGM's Procurement Strategy will be followed	Yes	
Consultation and Engagement – TfGM’s Consultation and Engagement Strategy will be followed	Yes	Should the Proposed Franchising Scheme be made, any future consultation and engagement activity will take into consideration those with protected characteristics.
Projects – Project Management Procedures will be followed	Yes	

Question 17:

Is a Full Impact Analysis needed? If in question 8 you identified two or more adverse impacts you should either abort the activity, or carry out a full analysis

No (not required)

Question 18:

List all of the information that you have taken into account in carrying out this Equality Analysis.

- Steer Davies Gleave (2018) TFGM Segmentation – insights into bus use
- TfGM (2020) GM TRADS, years 6,7 and 8 (2017-19)
- Transport Focus (2018) Using the bus: what young people think
- TfGM (2018) Network principles survey
- TfGM (2017) GM Segmentation survey
- TfGM (2019) Sales Funnel
- TfGM (2020) Access and Inclusion
- Results from the first consultation: 14 Oct 2019 – 8 Jan 2020
- Results from the second consultation: 2 Dec 2020 – 29 Jan 2021

Question 19:

Additional comments

Following a review of the responses to the consultations, it is not anticipated that the Proposed Franchising Scheme would have any adverse impacts on those with protected characteristics and there would be positive impacts of varying degrees on certain groups. Should the Proposed Franchising Scheme be implemented, appropriate monitoring activity would be considered and developed as necessary.

Should the Proposed Franchising Scheme be implemented, any future proposed changes that may impact on those with protected characteristics would be subject to due consideration by GMCA/TfGM of the public sector equality duty supported by further EqIAs as required.

Validated by	Michael Renshaw, Bus Reform Programme Senior Responsible Officer
Date validated	08/03/21
Next review date	TBC – subject to GMCA consideration and Mayoral decision