

DRAFT EQIA ON THE PROPOSED CONSULTATION EXERCISE

Question 1

Is this a new or existing activity?

New

Question 2

What is the main aim and purpose of the activity?

The activity consists of a public consultation on the Greater Manchester Combined Authority's (GMCA) proposed franchising scheme, which is set out and considered in an assessment prepared by TfGM on behalf of the GMCA.

The overall aim of the activity is to undertake a consultation that meets the requirements of section 123E of the Transport Act 2000 (as amended by the Bus Services Act 2017) (the Act). This would be done by obtaining the views of a wide range of stakeholders (some of whom the GMCA are required to consult by the Act) on its proposal.

An Equality Impact Analysis of the proposed franchising scheme (distinct from the present document) has been produced and will form part of the subject matter of the consultation.

Question 3

List the main elements of the activity. (for strategies list the main policy areas):

- Publication – the Act requires the GMCA to publish various materials in undertaking a consultation. This would include a consultation document, the assessment, an auditor's report and a notice of the proposed scheme. These materials would be published online and hard copies of the same would be available in various locations across GM.
- Communication – information messages giving details of the consultation via different forms of media.
- Stakeholder engagement – contact and engagement with a variety of stakeholders as part of the consultation process.
- Consultation – various activities to give people across GM the opportunity to have their say on the proposals.
- Deliberative research – undertaking an additional activity to arrange for focus groups to consider the proposals.

Question 4

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

On 30 June 2017, the GMCA decided to use the powers available in the Act to prepare an assessment of a proposed franchising scheme, which was completed and subsequently approved by the GMCA on 28 June 2019. Subject to the GMCA obtaining a report from an independent audit organisation on its assessment and subject to the GMCA wishing to proceed with the proposed scheme upon consideration of that audit report, the next step would be for the GMCA to undertake a consultation. It is therefore proposed that subject to the above, TfGM would undertake a consultation on its proposed franchising scheme on behalf of the GMCA. This would be a new activity.

Question 5

What outcomes does the activity aim to achieve?

- To present the proposal and other required materials to the widest range of people, including those persons GMCA are required to consult by the Act across GM;
- That all stakeholders are provided with an opportunity to engage with the proposals and respond to the consultation;
- That all responses will be taken into account when reporting on the results and outcome of the consultation; and
- That the GMCA and the Mayor of Greater Manchester are presented with the results and outcome of the consultation as may be required under the Act.

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 -

Partners including Operators - Yes

Suppliers - Yes

Others - please specify – The main beneficiaries of the consultation are the same as those who are anticipated to benefit from the proposed franchising scheme, since the consultation will give them the opportunity to understand, comment on and therefore potentially influence the proposed scheme. Those beneficiaries are: the travelling public and Greater Manchester residents more generally; existing and potential Greater Manchester businesses; and existing and potential Greater Manchester bus operators / suppliers / employees.

Question 7

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

Plan to consult <i>- Who do you plan to consult and when?</i>

No. TfGM has extensive experience of consultations and of the measures needed to accommodate groups with protected characteristics.

Preamble to response to Question 8

Consultation is inherently positive – it is unlikely that inviting someone to comment on a proposition will have adverse effects on them. It is possible that members of some groups with protected characteristics are at a higher risk than the general population of being unaware of the consultation, of not being able to understand it or of being unable to effectively communicate their views. Where this is the case, measures to ameliorate these risks are noted under Question 8.

By way of context for Question 8, the following actions, of relevance to many of the protected characteristic groups, will be undertaken:

- the consultation document will be written in plain English and a plain English review of the summary will be undertaken before its publication;
- the consultation document will be augmented with additional explanatory and illustrative material, including appropriate visual material;
- printed consultation document summaries and response forms will be made available in accordance with TfGM's working practices on inclusive communication. This will include copies being made available in public buildings across GM, in relevant neighbouring authority areas and through public information stands;
- audio and large print versions of the consultation document will be available upon request;
- TfGM will be providing information stands, public drop-in events and a telephone helpline for those who wish to talk to us face-to-face, including those who may be unable to read our written material or to respond via our response channels, for example because of a disability;
- public events organised by TfGM will take place in fully accessible venues.

A number of response channels will be provided:

- respondents will be able to use the online consultation web address, where questions can be answered online or downloaded;
- it will be possible to scan and email hard copies of the response form or return it to a freepost address;
- anyone who cannot respond via the channels above or wishes to obtain a different format of the consultation will be able to email or phone the consultation team to discuss their individual requirements; and
- there will also be a shorter version of the questionnaire for people to complete.

A dedicated language line will also be set up to assist people who might require it.

In addition, a market research company has been engaged to carry out independent deliberative research (focus groups and workshops) to supplement responses submitted as a result of to the consultation material and associated publicity. A cross-section of the population will be recruited, and this will include people from groups with protected characteristics.

Question 8

Having due regard for 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 | Adverse | Comment/Evidence |
| Children and Young People (aged 19 and under) | Medium | | <p>The consultation materials will be written in plain English.</p> <p>The consultation document will be augmented with additional explanatory and illustrative material, including appropriate visual material.</p> |
| Older People (aged 60 and over) | Medium | | <p>According to recent research from Ofcom, a relatively high proportion of people aged over 65 do not use the internet: 33% of 64-74-year-olds and 48% of those aged 75 and over. (Ofcom, 2019, <i>Adults: Media use and attitudes report 2019</i>, p19.)</p> <p>Printed consultation documents, summaries and response forms will be made available in accordance with TfGM's and GMCA's working practices on inclusive communication. This will include copies being made available in public buildings across GM, in relevant neighbouring authority areas and through public information stands.</p> |

| Disability | | | |
|--|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| People with physical impairments (Includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user) | Medium | | <p>Public events organised by TfGM will take place in accessible venues.</p> <p>The consultation materials will be available in a variety of formats, including in hard copy and electronic. Anyone who cannot respond via the standard channels provided or wishes to obtain a different format of the consultation will be able to email or phone the consultation team to discuss their individual requirements.</p> <p>Groups representing disabled people will be engaged as appropriate.</p> |

| Disability | | | |
|---|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| People with communication or sensory impairments (Includes blind/partially sighted, deaf/hard or hearing, difficulty speaking) | Medium | | <p>Public events organised by TfGM will take place in accessible venues.</p> <p>Modern PCs, laptops, tablets and other electronic devices have software installed which enables the user to convert text into a more readable or otherwise intelligible format.</p> <p>Anyone who cannot respond via the standard channels provided or wishes to obtain a different format of the consultation will be able to email or phone the consultation team to discuss their individual requirements.</p> <p>Requests for versions of the consultation materials in additional formats (e.g. Braille, British Sign Language) will be considered in accordance with GMCA's working practices on inclusive communication.</p> <p>Groups representing disabled people will be engaged as may be appropriate.</p> |
| People with a learning disability or cognitive impairment (Includes conditions which affect ability to learn, understand, read, remember, and concentrate e.g. Downs Syndrome, autism, ADA) | Medium | | <p>The consultation materials will be written in plain English.</p> <p>The consultation document will be augmented with additional explanatory and illustrative material, including appropriate visual material.</p> <p>Requests for Easy Read versions of the consultation material will be handled on a case-by-case basis in accordance with GMCA policies.</p> <p>TfGM will be providing information stands, public drop-in events and a telephone helpline for those who wish to talk to us face-to-face. This will allow explanations of the proposals to be tailored to the needs of the individual, including those who may not be able to read our written material. There will also be a shorter version of the response form available.</p> <p>Groups representing disabled people will be engaged as may be appropriate.</p> |

| Disability | | | |
|--|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| People with mental health problems (Includes depression, schizophrenia) | Medium | | No obvious risks of exclusion arise for members of this group. |
| People with long standing illness/health condition (Includes cancer, HIV, MS, diabetes, heart disease, epilepsy, continence) | Medium | | No obvious risks of exclusion arise for members of this group. |
| Other disability / impairment not covered by any of the above | Medium | | As above. |

| Gender | | | |
|--------------------|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| Men | Medium | | No obvious risks of exclusion arise for members of this group. |
| Women | Medium | | As above. |
| Transgender People | Medium | | As above. |

| Race | | | |
|--|----------|---------|---|
| Target Group | Positive | Adverse | Comment/Evidence |
| Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background) | Medium | | <p>For some members of this group, language may present a barrier to full participation.</p> <p>The consultation materials will be written in plain English. A dedicated language line will also be set up to assist people who might require it.</p> <p>Requests for versions of the consultation document in alternative languages will be considered in accordance with TfGM's and GMCA's working practices on inclusive communication. There will also be a shorter version of the response form available.</p> |

| Race | | | |
|---|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| Black or Black British Backgrounds (This includes Caribbean, African or any other black background) | Medium | | As above. |
| Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background) | Medium | | As above. |
| White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers) | Medium | | No obvious risks of exclusion arise for members of this group. |
| Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds) | Medium | | <p>For some members of this group, language may present a barrier to full participation.</p> <p>The consultation materials will be written in plain English. A dedicated language line will also be set up to assist people who might require it.</p> <p>Requests for versions of the consultation materials in alternative languages will be considered in accordance with TfGM's and GMCA's working practices on inclusive communication. There will also be a shorter version of the response form available.</p> |
| Arabs | Medium | | As above. |
| Any other background not covered by any of the above | | | No other groups identified. |

| Religion/Belief | | | |
|-----------------|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| Buddhists | Medium | --- | No obvious risks of exclusion arise for members of this group. |
| Christians | Medium | --- | As above. |

| | | | |
|---------|--------|-----|-----------|
| Hindus | Medium | --- | As above. |
| Jews | Medium | --- | As above. |
| Muslims | Medium | --- | As above. |
| Sikhs | Medium | --- | As above. |
| Others | Medium | --- | As above. |

| Sexual orientation | | | |
|--------------------|----------|---------|--|
| Target Group | Positive | Adverse | Comment/Evidence |
| Gay men | Medium | | No obvious risks of exclusion arise for members of this group. |
| Lesbians | Medium | | As above. |
| Bisexual | Medium | | As above. |

| Other | | | |
|--------------|----------|---------|-----------------------------|
| Target Group | Positive | Adverse | Comment/Evidence |
| Other | | | No other groups identified. |

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.

Preamble to response to Question 12

The purpose of monitoring is to identify the emergence, as responses to the consultation are received, of any under-representation of protected characteristic groups in order that

corrective action can be taken. However, there are several practical difficulties with monitoring:

- The personal characteristics of people who respond by letter or email are unlikely to be known, other than possibly gender.
- Where people fill in a form, it is only possible to capture the broadest characteristics of respondents (age, disability, gender and race) since to do otherwise would risk deterring or alienating respondents with a long-list of detailed questions.
- There is no reliable yardstick against which to measure the aggregate profile of respondents. Even assuming equal awareness, understanding and ability to respond, it is unlikely that the profile of respondents would match that of the general population (and in some cases, the characteristics of the latter are unknown – e.g. sexual orientation).
- The volume of responses to consultations tends to be low in its early stages, making any assessment of the emerging profile even more unreliable.

For these reasons, only high-level monitoring will be undertaken (on a weekly basis) to identify issues of clear concern.

Question 12

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

| Equality Group | | Details |
|--------------------|--|---|
| Age | | Broad age category will be monitored. |
| Disability | | Broad categories will be monitored. |
| Gender | | The ratio of males to females will be monitored. |
| Race | | Broad categories will be monitored. |
| Religion/Belief | | Will not be monitored. There is no reason to expect that members of these groups are at a higher risk of being unaware of the consultation, of not being able to understand it or of being unable to effectively communicate their views. |
| Sexual orientation | | Will not be monitored. |
| Other | | None identified. |

Question 13

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

See Question 12.

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 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. Note that, a separate Equality Impact Analysis has been prepared for the proposed franchising scheme and will be published at the point of undertaking any consultation.

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 | |
| Procurement – TfGM's Procurement Strategy will be followed | Yes | |
| Consultation and Engagement – TfGM's Consultation and Engagement Strategy will be followed | Yes | |
| 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 then 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

Ofcom (2019), Adults: Media use and attitudes report 2019

Question 19

Additional comments

This document is intended for internal purposes only in so far as it considers the impacts of the consultation exercise.

Supporting documents

Ofcom (2019), Adults: Media use and attitudes report 2019