

## EQUALITY IMPACT ASSESSMENT INTRODUCTION

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 people 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.
- Consider intersectionality and overlapping and interdependent systems of discrimination or disadvantage.

“Relevant protected characteristics” are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; married/civil partnership and sexual orientation.

N.B. ‘Carers’ and Low-Income Households and Other have also been included in the template, as although not defined as ‘protected characteristics’ by the Equality Act (2010), it is important to consider the effect on groups. It is important to note that the categories contain important subcategories.

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.

## Equality Impact Analysis

**Save a new version of this document in a different file area prior to populating it**

**For support in completing this form, please refer to the document or contact the Inclusion & Equalities Manager.**

### Section one: Proposal Context

<b>a) Name of Proposal</b> (e.g., projects, policies, plans, programmes and services)	Greater Manchester Franchising Scheme for Buses – Service Permits Scheme and Conditions
<b>b) Function</b>	Bus Franchising – Network Strategy & Design
<b>c) key contact for proposal</b>	Anthony Crompton
<b>d) New or Existing Proposal</b>	<p><b>New Proposal</b></p> <p>In March 2021, a decision was taken by the Mayor of Greater Manchester to introduce a bus franchising scheme covering the entirety of Greater Manchester. Under franchising, most services and their frequencies will be determined by GMCA. Bus operators would run these services under a local service (franchise) contract awarded by TfGM on GMCA’s behalf. Once franchising becomes effective, no local service which has a stopping place within Greater Manchester may be provided unless:</p> <ul style="list-style-type: none"> <li>• It is provided under a franchise contract.</li> <li>• It is an interim service.</li> <li>• <b><i>The service is provided under a service permit.</i></b></li> <li>• The service is excepted from regulation under the scheme.</li> </ul> <p>TfGM will become responsible for the arrangement and operation of local bus services through the phased introduction of the franchising scheme across Greater Manchester between September 2023 and January 2025.</p> <p>Local bus services that are not provided as part of the franchised network, not excepted from the franchised network or are not an interim service (as defined in s.123O of the Bus Services Act 2017 (the “Act”)) will require a Service Permit issued by TfGM to operate within Greater Manchester once the franchising scheme begins.</p>

<p>e) Aims, objectives &amp; purpose of the proposal summary, including desired outcomes (attach proposal as applicable)</p> <p><i>PLEASE ATTACH PROPOSAL/ BUSINESS CASE (if available)</i></p>	<p>Purpose: To introduce the Service Permits process as part of the wider Bus Franchising Scheme and a statutory requirement of the Act. The aim of the Service Permits process is to allow services that aren't either a franchised service or an exempted service to apply for a permit to operate in the area of the Franchising Scheme. The Service Permits will allow bus operators operating cross-boundary services to continue to provide vital transportation links to the public between GM and the neighbouring authorities.</p> <p>Aim: A scheme for implementing Service Permits in Greater Manchester is operational.</p> <p>Objective: To issue Service Permits in advance of Tranche 1 Go Live (24.09.2023) (and subsequent Tranches) for Bus Franchising to bus operators running local bus services:</p> <ul style="list-style-type: none"> <li>• that are not provided as part of the franchised network.</li> <li>• not excepted from the franchised network.</li> <li>• are not an interim service.</li> </ul> <p>A Service Permit will normally be issued for a specified period of up to five years. Where a service is being provided under contract to a Local Transport Authority, the permit length may be aligned with the expiry date of the contract to provide the service (a specified period of up to eight years).</p>
<p>f) Main Stakeholders</p>	<p>External: Bus Operators, Neighbouring Local Transport Authorities, GM Travelcards Ltd, Confederation of Passenger Transport, Office of the Traffic Commissioner</p>

## Section Two: Baseline Assessment/Scoping

To assess the impacts of the proposal, you first need to understand the current inequalities in provision, access, participation, or opportunities as they are now, before the implementation of your proposal. These groups of people may be different from your target audience or main stakeholders. Please see the EqlA Guidance notes before completing this section.

Protected Characteristic	How well are people within this protected characteristic served within the current service provision, policy or infrastructure?	Are there any existing: barriers to access, or participation, or disadvantages faced by groups of people within this protected characteristic? (in relation to aim of proposal)	Evidence source	Stakeholder/Community Groups relevant to proposal e.g. representative community groups, dedicated services, schools, places of worship
--------------------------	---	---	-----------------	--

## Equality Impact Analysis

Age	<p>Bus services are accessible for all ages.</p> <p>GM TRADS data shows a slightly higher than average proportion of bus users amongst people aged 60 and over. Also, 21% of bus trips in 2019 were made by people who have a national concession pass (or concession pass plus) for disabled people.</p>	<p>TfGM research on use of travel information sources has highlighted that older users may be more reliant on transition (print-based) information (bus timetables etc). Older residents are also less likely to have access to the internet using a smartphone, potentially limiting access to some information, and using smartphone APPS and buying online tickets.</p>	<p>GM TRADS (2019), Travel information research (2019).</p>	
Disability	<p>Bus services are accessible for people with disabilities but require improvements. People with physical impairments are less likely than people without physical impairments to make bus trips (accounts for 5% of bus trips). Along with this, 9% of the GM population have a physical impairment.</p> <p>Disabled people in GM are less likely than those without a disability or long-standing health condition to have access to a car and therefore more likely to rely on public transport, including bus.</p> <p>People with a communication or sensory impairment, learning disability or cognitive impairment, or mental health difficulties are more likely than those with no disability to travel</p>	<p>Disabled bus users are less satisfied than those without a disability. This is focussed mainly on a number of aspects: ease of getting to the stop, personal security getting to the stop and waiting at a bus stop.</p> <p>There are also issues with limited capacity for wheelchair users and lack of accessible on-bus information via visual and audio announcements.</p> <p>In the year ending March 2020, there were 8649 disability hate crimes (a rise of 9% from the previous year). In the year ending March 2022, disability hate crimes increased further to 14,242.</p>	<p>GM Bus Passenger Survey (2019), GM TRADS (2017-2019). Hate Crime, England and Wales, 2019 to 2020 – GOV.UK. Hate Crime, England and Wales, 2021-2022 – GOV.UK.</p>	

## Equality Impact Analysis

	by bus. Those with a disability or long-standing health condition are also more likely to travel by taxi.			
<b>Sex</b>	<p>Bus services accessible to all sexes. Women were more likely to use bus services than men in 2017-2019, but men were more likely to use buses in 2021.</p> <p>It is also recognised that woman are more likely to 'trip-chain' than men.</p>	<p>Women who use the bus at night are more likely to be dissatisfied with perceived and actual personal security at night, either getting to the bus stop, waiting at the stop, or on the bus itself. Moreover, women are less likely to use bus services at night.</p> <p>Women are also less satisfied than men with aspects of onboard experience (e.g. personal space on board, comfort and cleanliness etc.).</p>	GM TRADS (2017-2019, 2021), Network Principles (2022), Invisible Women.	
<b>Gender Reassignment</b>	All genders able to access bus services.	<p>Transgender people are more likely to feel unsafe or experience victimisation or harassment when travelling on the bus network (particularly at certain times – night - or in certain areas).</p> <p>In England and Wales, transgender identity hate crimes by 16% (to 2,540). These percentage increases are smaller than seen in recent years. In the year ending March 2022, there were 4,355 transgender hate crimes showing a sharp increase.</p>	<p>Hate Crime, England and Wales, 2019 to 2020 – GOV.UK.</p> <p>Hate Crime, England and Wales, 2021-2022 – GOV.UK.</p>	
<b>Race/Ethnicity</b>	<p>Services are available to all races/ethnicities.</p> <p>GM residents from black or black British backgrounds are more likely than average to be bus users and more likely than</p>	Access to buses/the bus network may be affected by over or under-provision of services in particular areas where people of different ethnicities live.	GM TRADS (2019), Census (2011).	

## Equality Impact Analysis

	<p>average to use the bus frequently (five or more days per week). Census figures also show this group are more likely than average to use the bus to access work in GM.</p> <p>People from Black or Black British backgrounds in GM are also less likely than average to have access to a car.</p> <p>Also, people from mixed ethnic backgrounds in GM are more likely than average to be use bus users and more likely than average to use buses frequently (five or more days per week). In GM, this group is also less likely than average to have access to a car.</p>			
<b>Marriage/Civil Partnership (workforce only)</b>	N/A	N/A	N/A	N/A
<b>Pregnancy &amp; Maternity</b>		Issues have been noted for parents with prams on buses in particular: lack of space on board and time to get the pram onto the bus and settled before the bus pulls away.	Network Principles (2022).	
<b>Religion/Belief</b>	N/A	N/A	N/A	N/A
<b>Low Income Households</b>	Bus services available for all but users are more likely to be from low-income households/areas with higher deprivation levels than the GM average.	Barriers arise for those living in areas with lower bus coverage. Bus users are also less likely to have access to a car, meaning that they have reduced options for alternative travel.	GM TRADS (2021).	

## Equality Impact Analysis

	Between 2 fifths and half of bus users are from the 'urban adversity' ACORN category (45% in 2021).			
<b>Carers</b>	Carers able to access bus services.	Carers are not currently entitled to reduced/free fares in GM which may present a barrier to travel.		
<b>Other/General</b>	Many rural areas have limited or no connection to public transport; and traditionally rural transport has been based predominantly on road vehicles.	The lack of transport accessibility and connectivity in rural areas has a strong impact on those with limited access to private motorised transport, such as children, older people and people with disabilities.	Velaga et al. (2012)	

## Section Three: Engagement, Consultation & Data Gathering

You may be required to involve and consult stakeholders during your assessment to understand the impact of the proposals. The extent of the consultation/engagement will depend on the nature of the policy, plan or project and whether there has been previous engagement activity with the groups who will be impacted (directly or indirectly) that is relevant to this proposal. (Don't forget to involve trade unions if staff are affected and consider socio-economic impact as well as community and third sector groups for different protected characteristics).

**If consultation or engagement activity hasn't been undertaken with people who may be affected by the proposal, or is not planned, why not?**

n/a

## Equality Impact Analysis

Planned activity	Stakeholders/ communities involved	Estimated timeframes	Methods	How will you publicise the engagement activity
Consultation	Bus Operators, Neighbouring Local Transport Authorities	February 2023	Online questionnaire	Direct contact with main stakeholders via email. TfGM website and notices on interchanges to reach any other interested party.

You have a duty under the Public Sector Equality Duty to consider what measures can be taken to design and deliver engagement activity that is accessible to different groups of people and implement the measures wherever this is feasible to do. This particularly necessary where you have identified barriers in accessing the relevant scheme, service or provision, or in participating in engagement activities for particular groups of people who have an interest in or are likely to be impacted by the change. This includes considering how you communicate or publicise the engagement activity. You should consider all potential adjustments and consider the feasibility. If you are unsure what measures are required to make the engagement activity more accessible, you should ask representatives of the relevant communities or groups. You can also contact the TfGM engagement team [engagement@tfgm.com](mailto:engagement@tfgm.com)

Using the information identified in section 2, complete the table below to identify what actions need to be considered and actions

Demographic Group	Barrier to participation	Actions which could remove barriers	Feasibility/ expected impact of action	Agreed Action
n/a				

## Section Four: Equality Impact Assessment - Please use the EqIA Guidance document for reference

For the following question describe any potential positive or negative impacts of the proposal for different groups of people.

To explore the impacts of your proposal, you should use your baseline as a comparison with how the proposal could impact these inequalities (either positively by reducing the inequality or negatively by worsening it). Think about how this might differ from the baseline for people with each protected characteristic. You should consider the impact of not inaction based on your findings from section 1.

Include any sources of data you have used to inform this view (including desktop research and engagement activity).

## Equality Impact Analysis

(A) Please check all that apply	(B) Describe positive/negative impacts of different elements of your proposal.	(C) Specify Positive/Negative per Impact	(D) user data, survey, engagement/consultation etc, related EqIAs/Interdependencies	(E) consider how you will you mitigate identified negative impacts?	(F)	(G) The date you will review your changes/mitigations have been effective
Age						
Equality Group	Impact Description	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/>	No differential impact					
Children (under 13) <input type="checkbox"/>						
Young People (13- 18) <input type="checkbox"/>						
Young Adults (18 –30) <input type="checkbox"/>						
Adult (30-55) <input type="checkbox"/>						
Older Adults (55+) <input type="checkbox"/>						
Disability						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/>	The permitted services will be required to comply with PSVAR. Therefore, no differential impact expected.	Neutral	Service Permit Potential Operational Conditions - Accessibility	Condition added to Service Permit Scheme re accessibility: Vehicles must also comply with the Public Service Vehicle Accessibility Regulations 2000 (PSVAR), which requires them to be fully accessible		
Mobility <input type="checkbox"/>						
Visual <input type="checkbox"/>	The Department for Transport is introducing rules that will require almost every local bus or coach service to provide audible announcements and visual displays identifying the route and direction, each		<a href="#">New onboard announcements to make Britain's buses accessible for everyone -</a>			
Hearing <input type="checkbox"/>						
Dexterity <input type="checkbox"/>						
Communication <input type="checkbox"/>						
Learning/Understanding/Concentrating <input type="checkbox"/>						

## Equality Impact Analysis

Memory <input type="checkbox"/> Mental health <input type="checkbox"/> Stamina, breathing or fatigue <input type="checkbox"/> Social or behavioural <input type="checkbox"/> Other specify_____ <input type="checkbox"/>	upcoming stop, and the beginning of any diversions.  The changes will be implemented gradually, with almost all vehicles required to comply by October 2026.  At present, there is patchy provision across the country, with only 30% of buses outside London providing this information, which can be a major barrier for disabled people wanting to travel by bus or coach.		<a href="https://www.gov.uk">GOV.UK (www.gov.uk)</a>	All staff involved with the service to receive disability, equality, and customer care training, as part of the operators planned training programme for its operational staff.		
Gender						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/> Male (inc Trans Male) <input type="checkbox"/> Female (inc Trans Female) <input type="checkbox"/> Gender Fluid <input type="checkbox"/> Gender neutral <input type="checkbox"/>	No differential impact					
Gender Reassignment						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
Transgender <input checked="" type="checkbox"/>	No differential impact					
Race/Ethnicity						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date

## Equality Impact Analysis

All <input checked="" type="checkbox"/> Pakistani <input type="checkbox"/> Indians <input type="checkbox"/> Bangladesh <input type="checkbox"/> Chinese <input type="checkbox"/> Caribbean <input type="checkbox"/> African <input type="checkbox"/> Mixed /Multiple Ethnic Groups <input type="checkbox"/> Scottish & Welsh <input type="checkbox"/> Gypsy <input type="checkbox"/> Irish Travellers <input type="checkbox"/> Irish <input type="checkbox"/> Polish <input type="checkbox"/> Spanish <input type="checkbox"/> Romanians <input type="checkbox"/> Arabs <input type="checkbox"/> Jewish <input type="checkbox"/> Other Specify _____ <input type="checkbox"/>	No differential impact					
Religion/Belief						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/> Buddhism <input type="checkbox"/> Christianity <input type="checkbox"/> Hinduism <input type="checkbox"/> Judaism <input type="checkbox"/> Islam <input type="checkbox"/> Sikhism <input type="checkbox"/>	No differential impact					

## Equality Impact Analysis

No religion <input type="checkbox"/>						
Other specify ____ <input type="checkbox"/>						
<b>Sexual Orientation</b>						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/> Gay man <input type="checkbox"/> Lesbian <input type="checkbox"/> Bi-sexual <input type="checkbox"/> Transgender <input type="checkbox"/> Non-binary <input type="checkbox"/> Other specify ____ <input type="checkbox"/>	No differential impact					
<b>Marriage/Civil Partnership</b>						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
Not applicable						
<b>Pregnancy/Maternity</b>						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
Not applicable						
<b>Carers</b>						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
Not applicable						

## Equality Impact Analysis

Deprivation						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/> Low-income household <input type="checkbox"/> Socially excluded <input type="checkbox"/> No recourse to public funds <input type="checkbox"/> Digital exclusion <input type="checkbox"/> Homeless people <input type="checkbox"/> Asylum seekers/refugees <input type="checkbox"/> Other specify _____ <input type="checkbox"/>	There is a possibility that a socially deprived area is no longer served due to an operator not applying for a permit.	Negative		Pre-engagement with operators to facilitate and encourage operators to apply for permits.  Review network and identify areas that are unserved as a result of an operator not applying for a permit. Engage with Neighbouring Authority to consider whether putting in place suitable mitigations is appropriate e.g., running a special service.		
Other Groups						
Equality Group	Impact	Positive/Negative Impact	Evidence Source	Action proposed to mitigate any negative Impact	Lead	Review Date
All <input checked="" type="checkbox"/> Armed forces <input type="checkbox"/> looked after children <input type="checkbox"/> people with poor literacy <input type="checkbox"/> health literacy <input type="checkbox"/> rural areas <input type="checkbox"/> Other specify <input type="checkbox"/>	No differential impact					

## Section Five: Evidence Gaps

Are there gaps in information that make it difficult or impossible to form an opinion on how your proposals might affect different groups of people, please explain what evidence gaps have been identified. Are there groups for who you don't have data or insight in regard to how the proposal might impact a protected group.

Protected Characteristic	Evidence Gap

**Your completed EqlA should be sent to the TfGM Equalities Lead for approval.**

Process signed off by	
Date completed	
Equality Validator's Comments	
Validated by (Equality Team)	
Date validated	
Next Review Date	