

## Appendix 10 - Equality Impact Analysis Full Tool with Guidance

### Overview

This Tool has been produced to help you analyse the likelihood of impacts on the protected characteristics – including where people are represented in more than one – with regard to your new or proposed policy, strategy, function, project or activity. It has been updated to reflect the new public sector equality duty and should be used for decisions from 5<sup>th</sup> April 2011 onwards. It is designed to help you analyse decisions of high relevance to equality, and/or of high public interest.

### General points

1. 'Due regard' means the regard that is appropriate in all the circumstances. In the case of controversial matters such as service closures or reductions, considerable thought will need to be given the equalities aspects.
2. Wherever appropriate, and in all cases likely to be controversial, the outcome of the EIA needs to be summarised in the Cabinet/Cabinet Member report (section 08 of this tool) and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.

### Timing, and sources of help

Case law has established that having due regard means analysing the impact, and using this to inform decisions, thus demonstrating a conscious approach and state of mind ([2008] EWHC 3158 (Admin), [here](#)). It has also established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, through to the recommendation for decision. It should demonstrably inform, and be made available when the decision that is recommended. This tool contains guidance, and you can also access guidance from the EHRC [here](#). If you are analysing the impact of a budgetary decision, you can find EHRC guidance [here](#). Advice and guidance can be accessed from the Opportunities Manager: [PEIA@lbhf.gov.uk](mailto:PEIA@lbhf.gov.uk) or ext 3430.

## Full Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
<b>Financial Year and Quarter</b>	11/12 Q3
<b>Name and details of policy, strategy, function, project, activity, or programme</b>	<p><b>Changes to the Taxicard scheme</b></p> <p>The Taxicard scheme is a discretionary pan-London transport scheme that provides subsidised door-to-door transport for people who have serious and long term mobility impairment and difficulty in using public transport. The scheme is jointly funded by London boroughs and Transport for London (TfL), co-ordinated and administered by London Councils. A number of changes to the scheme, following a reduction in the top up funding provided to the Council from Transport for London (TfL) to run the scheme and in consideration of current pressures on council budgets, are being presented to Cabinet for consideration.</p>
<b>Lead Officer</b>	<p>Name: Gill Sewell            Position: Assistant Director, Children, Youth and Communities            Email: <a href="mailto:gill.sewell@lbhf.gov.uk">gill.sewell@lbhf.gov.uk</a>            Telephone No: 0208 753 3608</p>
<b>Date of completion of final EIA</b>	21/09 /11

Section 02	Scoping of Full EIA
<b>Plan for completion</b>	<p><b>Timing</b> – completion by 26 August 2011</p> <p><b>Resources</b> – Feedback from consultation with Taxicard users, database of Taxicard users</p> <p><b>Lead Officer</b> – Gill Sewell</p> <p><b>Other Officers</b> –Radhika Mehra (Project Officer), Natasha Price (Project Officer)</p>

**What is the policy, strategy, function, project, activity, or programme looking to achieve?**

## **Proposed changes to the Taxicard scheme**

### **Background to the scheme**

The Council currently contributes towards a pan-London Taxicard scheme for disabled residents in partnership with Transport for London (TfL). The Taxicard scheme provides subsidised taxis and private hire vehicles to residents with serious mobility impairments at similar costs to public transport. Each service user receives a total of 104 trips per annum, each with a minimum user charge of £1.50. Existing users, on average, use 29 journeys per year or 59 per active user (defined as using over 12 trips per year), which includes the use of double swiping. The scheme is intended to facilitate a degree of local travel and is not intended to meet all of the transport needs of residents with serious and long-term mobility impairments.

### **The financial context and consultation**

As detailed in the Cabinet Report at 2.3, from 2011/12 TfL have made changes to the way it distributes funding to participating boroughs, which will see the allocation of TfL top-up funding for H&F's Taxicard scheme reduce from £463,696 in 2010/11 to £296,512 by 2014/15. In addition, 2.3.2 of the Cabinet Report notes that any budget overspends will have to be met by individual boroughs rather than London Councils, as had previously been the case. The demand for Taxicards has increased and despite this, there have been no material changes to the scheme for 15 years. It should be noted, however, that taxi fares in general have increased during this period which may have had a negative impact on users. In order to address the predicted overspend within the current budget level, as a result of the changes to TfL funding allocation, the Council consulted with service users on potential changes to the Taxicard scheme (see section 5 of the Cabinet Report) and in response to the consultation and the decreasing funding from TfL, is proposing a number of changes to the operation and eligibility criteria for Taxicard scheme. These recommendations will enable H&F to target the service to those who most need it whilst giving confidence that the council can continue to operate the scheme and mitigate the impact of reduced funding from TfL. The recommendations are detailed in section 7 of the Cabinet report.

H&F currently has 2,345 Taxicard users (according to London Councils' database at the end of 2010/11). 1,113 (47%) of these are 'active users' of the scheme, defined as using greater than 12 trips in a year. This is detailed in section 2.1.1 of the report. Every registered service user (2,336 users were registered at the start of the consultation) was sent a paper consultation document to complete and return. There were 909 responses and additional information of 20 users who had passed away and have subsequently been removed from our register. Removing these 20 from the total number of users at the time of consultation means that the overall response rate is 39%. If the number of active users were taken into account it is likely that the response rate would be much higher.

### **Changes proposed**

The key changes to the Taxicard scheme being proposed for implementation from January 2012 are as follows:

1. To increase the minimum user charge by £1 per trip from £1.50 to £2.50 from January 2012
2. To reduce the Council's subsidy contribution by £2 per trip from January 2012
3. To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1
4. In response to the public consultation, to maintain double swiping until April 2014.
5. In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.
6. To review the eligibility of Taxicard users and send the Taxicard database to the national fraud initiative every two years.
7. To carry over any unused contingency in the Taxicard scheme budget until 2014/15.
8. That the Leader transfers Cabinet responsibility for the Taxicard scheme from the portfolio of the Cabinet Member for Children's Services to the portfolio of the Cabinet Member for Residents Services under the Council's Scheme of Delegation.
9. That the Leader transfers responsibility for the Taxicard scheme from the Director of Children's Services to the Director of Finance and Corporate Services under the Council's Scheme of Delegation.

Recommendations 8 and 9 refer to the internal management of the scheme and have therefore not been considered as part of this assessment. However, it should be noted that it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible for the Taxicard scheme or need a greater level of service.

The potential changes to the Taxicard scheme that we asked service users about are broken down into two areas: (1) changes recommended by London Councils at section 3 in the Cabinet Report and (2) additional recommendations from H&F at section 4 in the Cabinet Report. These proposed changes, the response on each from the public, and officers' recommendations are detailed below:

*Changes recommended by London Councils :*

*Increase Minimum User Charge*

The current minimum user charge for a Taxicard user is £1.50 per trip. The Council is proposing to increase the minimum user charge to £2.50 (a £1 increase). This change was recommended by the Transport and Environment Executive Sub Committee in order to address the projected budget overspend for the pan-London Taxicard scheme and has been implemented in 28 of the 32 London Boroughs on the scheme. This option was supported by respondents to the Taxicard consultation as the most preferred change.

- **Officers recommend that this change is proposed for implementation from January 2012**

#### *Reduce the Maximum Subsidy Tariff*

The trip subsidy is the maximum amount that funders (LBHF and TfL) pay towards a single trip. Once this maximum has been reached the user is responsible for the remaining fare. This option was not preferred by respondents to the consultation or in the focus groups, although it was also not the least preferred option. It was clear that users who prefer to use their Taxicard for longer journeys were more concerned by this change. By reducing the subsidy, shorter journeys will not be affected.

- **Officers recommend reducing this maximum subsidy by £2 from January 2012.**

#### *End Double Swiping*

Currently, if a trip goes above the maximum subsidy users are permitted to “double swipe,” using two of their annual trip allowances for one journey in order to travel further distances. London Councils recognised that ending double swiping is likely to have the biggest impact on service users. Ending double swiping was the least preferred option identified in the consultation process and therefore officers have recommended maintaining double swiping for the benefit of users for as long as possible within the approved budget. It is therefore recommended that ending double swiping is implemented from April 2014 when the reduction in funding from TfL and level of predicted overspend is most severe.

- **Officers recommend that double swiping is maintained until April 2014, in response to the public consultation.**

#### *To reduce the annual limit to 8 trips per month*

Currently, users are provided with an annual trip limit of 104 trips per year. The consultation proposed that this is reduced to 8 trips per month (96 per year), with no roll over. Recognising the impact on user flexibility officers have recommended that an annual trip limit is maintained for the benefit of users for as long as possible within the approved budget. It is therefore recommended that monthly trip limits are applied in 2014/15 when the reduction in funding from TfL and level of predicted overspend is most severe.

- **Officers recommend that an annual trip limit of 104 trips per year is maintained until April 2014, in response to the public consultation.**

#### *Other changes proposed by H&F:*

#### *Changes to eligibility criteria*

Under the existing Taxicard scheme residents are automatically eligible for a Taxicard if they meet one of the following eligibility criteria:

- a) Higher rate mobility component of disability living allowance
- b) War pension mobility supplement

c) Registered severely visually impaired or blind

There is a fourth, non-automatic, category for applicants where none of these three conditions apply which requires a doctor's medical assessment form to be completed.

Under the proposed changes the Council will expand the automatic eligibility criteria to also include Blue Badge holders (which requires a mobility assessment) and those residents with a higher rate attendance allowance. Officers believe that these changes to the eligibility criteria will ensure that the scheme targets those residents for whom the scheme is intended. These additional criteria should provide a consistent mechanism of assessment as recommended in response to the consultation. Officers have considered the response to the consultation from the Hammersmith and Fulham Disability and Consultative Forum that recognises that "people on Taxicard in practice would not be able to walk the minimum of 400 metres needed to get to the average bus stop." An appeals process will be available for those users who do not meet the automatic eligibility, and are able to walk over 70 metres, but have mobility issues and live much further from public transport and therefore may consider themselves eligible for support.

Under the proposed changes, the Council would not continue with the current non-automatic criteria, which is currently a doctor's medical form. Officers have acknowledged that this was not recommended by the consultation results but have outlined the reasons at 4.1.6 of the Cabinet Report for this recommendation.

- **Officers recommend expanding the automatic eligibility criteria to also include Blue Badge holders (requires a mobility assessment) and those residents with a higher rate attendance allowance.**
- **Officers recommend that the non-automatic criteria, currently a doctor's medical form, is disbanded although a robust appeals process will still apply.**

**Profile of respondents to consultation:**

As is given here, the common profile of respondents emerged as:

Older (over 65) (Age): **572 (63%)**

Disabled "Has a long term illness, health problem or disability which limits daily activities or work done (self-declared)" (Disability): **810 (89%)**

Female (Sex): **565 (62%)**

**Profile of current Taxicard users, based on the London Council's database at the end of 2010/11:**

Older (over 65) (Age): **1,427 (64.2%)**

Disabled (based on the 3 automatic eligibility criteria for the Taxicard scheme) (Disability): **827 (35%)** (\*\* as noted in the Cabinet Report at 2.2.1 the remaining 65% of users would require a doctors medical assessment form to detail the nature of their mobility requirements).

Female (Sex): **1,509 (64%)**

The Race profile of service users is given in the analysis on Race below, and the proportions of disabled people represented within race groups have been given in different race groups to in order to highlight where some race groups are under, and some are over represented. Only one race group is broadly in line with the borough profile.

Further information is given below, where we have analysed the proposals against each protected characteristic, and used this to determine the relevance to (low, medium, high or unknown) and impact on each (positive, negative, neutral or unknown).

Age	<p>The scheme is open to all residents from the age of 2 (age at which you become mobile). Those under 18 are not currently covered by the protected characteristic of Age under the Equality Act 2010. Other protected characteristics do cover those under 18</p> <p>64.2% of Taxicard users are over the age of 65 (compared to the mid-year population estimates for 2009 of 10.3%). The high take up of residents over the age of 65 demonstrates the high relevance of all proposals to the age group of 65-plus.</p> <p><b>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</b></p> <p><b>Recommendation 2: To reduce the council’s subsidy contribution by £2 per trip from January 2012</b></p> <p>Given that a majority of Taxicard users are over 65 years old and therefore eligible for state pension it may be the case that users could be on a fixed income. Given this, recommendations 1 and 2 are likely to be of high relevance to the Council’s Public Sector Equalities Duties (PSED) in terms of the protected characteristic of Age, and to individuals in the age group over</p>	High	Negative
		High	Negative

65 in particular.

The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on users' ability to maximise use of the service. In particular each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.

A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on all age groups and older people in particular, as the majority of service users. This negative impact will be reduced or even mitigated by maintaining double swiping for the benefit of users until April 2014. The impact of ending double swiping at this time is discussed below. This also supports responses to the consultation that recommended a gradual implementation of changes.

It should be highlighted that the proposed changes to the scheme, which will increase the cost to the user will have a greater affect on older residents whose mobility issues may compound with age and therefore there may have a greater reliance on the Taxicard service. This is recognised as being particularly disadvantageous to women who generally out live men and



therefore may be using the service for a longer period of time. As highlighted below 64% of Taxicard users are women.

**Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1**

The council is proposing to develop the automatic eligibility criteria to include:

- (a) Blue Badge eligibility
- (b) Higher rate attendance allowance.

This will replace the non-automatic doctor medical assessment form for reasons outlined in 4.1.6 of the Cabinet Report, where it is noted that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, as stated above and below, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.

The proposed introduction of the higher rate attendance allowance, which is a benefit provided to people aged 65 or over who need someone to help look after them because they have a mental or physical disability, as an automatic eligibility criteria is likely to be of high relevance to the Council's PSED duties in terms of the protected characteristic of Age, and to individuals in the age group over 65 in particular. This proposal would also be positive for them.

Removing the non-automatic criteria will impact on those users that are currently accessing the scheme in this way. Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular. Therefore, it is not possible to determine the relevance of the proposal or an

High

Positive

Unknown

Unknown

		<p>impact as the protected characteristics of the 211 is unknown. Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people.</p> <p><b>Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.</b></p> <p>Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances. Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe and therefore the relevance of the proposal and impact on the protected characteristics of these users is unknown.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above is likely to have a negative impact on elderly residents who may be on a fixed income.</p> <p>Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change and supporting a gradual implementation process.</p>	High	Positive up to 2014/15 Negative thereafter

By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officer have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

**Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.**

The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently make more that 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year.

Officers have noted that applying monthly trip limits does affect the flexibility of the scheme. From 2014, this may have a particular impact on older residents who may find that they need their Taxicard more in a given month. In the consultation this particularly referred to frequent hospital appointments. Although H&F do not intend to monitor what the Taxicard is used for, the Taxicard is not intended for hospital transport as NHS provision is available, as noted in 4.3. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.

By deferring the decision to apply a monthly trip limit officers have attempted

High

Positive up to 2014/15  
Negative thereafter

	<p>to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.</p>	Low	Positive
	<p><b>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</b></p>	High	Positive
	<p>The above recommendation was considered following the consultation in which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and Freedom Pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.</p>	High	Positive
	<p><b>Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15</b></p> <p>Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may mitigate the need to implement any additional changes to the scheme which may have a negative impact on users.</p>	High	Positive
<p><b>Other Options not recommended</b></p> <p>Means testing was considered by officers to address the funding challenges but was not recommended.</p>	Various	Various	

	Disability	<p>The current Taxicard scheme is designed to improve social mobility and independence for those users, who because of their physical disability, are less able to use public transport.</p> <p><b>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</b></p> <p><b>Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012</b></p> <p>A number of Taxicard users are likely to be on a fixed income as they are in receipt of the Disability Living Allowance. Given this, recommendations 1 and 2 are likely to be of high relevance to the Council's PSED duties in terms of the protected characteristic of Disability. The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on disabled people's ability to maximise use of the service. In particular each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of</p>	High	Negative
			High	Negative

	<p>implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.</p> <p>A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on disabled users' ability to pay the increased amounts.</p> <p><b>Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1</b></p> <p>The council is proposing to develop the automatic eligibility criteria to include:</p> <ul style="list-style-type: none"> <li>(c) Blue Badge eligibility</li> <li>(d) Higher rate attendance allowance.</li> </ul> <p>This will replace the non-automatic doctor medical assessment form for reasons outlined in 4.1.4 of the Cabinet Report, where it is noted that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, as stated above and below, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p>	High	Positive
	<p>The higher rate attendance allowance is provided to all residents over the age of 65 who need someone to help them look after them because they have a physical or mental disability. Given the profile of current users, making this group automatically eligible will ensure the service is targeted at those users most in need of additional transport support and this will be both positive for those service users and of high relevance to the protected characteristic of Disability.</p> <p>The eligibility for Blue Badge includes a mobility assessment which includes a physical assessment of their ability to walk 70 metres, measuring gait, speed, pain and breathlessness. The assessment also includes a number of</p>	High	Positive

	<p>questions about the applicant's medical condition and history, their transport usage and needs, and their mobility. Respondents to the consultation as well as the response from the Hammersmith and Fulham Disability and Consultative Forum identified a need for a robust and fair assessment to determine eligibility. It is therefore recommended that the Blue Badge criteria, including the mobility component is applied to Taxicard users as part of the automatic eligibility. It is considered that this would have a positive effect on disabled service users and of high relevance to the protected characteristic of Disability.</p>	High	Positive
	<p>For those that are not automatically eligible under the above criteria an appeals process, similar to that currently applied to the Blue Badge mobility assessment will also be applicable for this scheme. Whether an individual is given a Taxicard at the appeals process will depend on whether sufficient evidence has been provided that the individual has a chronic, or severe long term mental/physical health problem which results in them finding it difficult to use public transport. The relevance to protected characteristics and impact on a service user will depend on the outcome of an individual case. However, officers note that this has been designed in order to ensure that the scheme as a whole reaches disabled people. As such, a robust appeals process is of high relevance to the protected characteristic of Disability and is positive.</p>	High	Positive
	<p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular. Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled</p>	Unknown	Unknown



	<p>people and so directly help those people to access the scheme.</p> <p><b>Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.</b></p> <p>Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances. Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe and therefore the relevance of the proposal and impact on the protected characteristics of these users is unknown.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above is likely to have a negative impact on disabled residents who may be on a fixed income.</p> <p>Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change as well as supporting a gradual implementation process.</p> <p>By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double</p>	High	Positive up to 2014/15 Negative thereafter
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	<p>swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&amp;F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible for the Taxicard scheme or need a greater level of service.</p>	High	Positive
	<p><b>Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.</b></p> <p>The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently make more than 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year, which remains greater than the current average usage for active users.</p> <p>Officers have noted that applying a monthly trip limit does affect the flexibility of the scheme. This may have a particular impact on disabled residents who may find that they need their Taxicard more in a given month. In the consultation this particularly referred to frequent hospital appointments. Although H&amp;F do not intend to monitor what the Taxicard is used for the Taxicard is not intended for hospital transport as NHS provision is available, as noted in 4.3. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.</p> <p>By deferring the decision to apply a monthly trip limit until April 2014 officers have attempted to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on</p>	High	Positive up to 2014/15 Negative thereafter

	<p>users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.</p>	Low	Positive
	<p><b>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</b></p> <p>The above recommendation was considered following the consultation in which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and freedom pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.</p> <p>By applying a robust assessment officers believe we will ensure that resources continued to be targeted at disabled persons who have the protected characteristic of Disability. This will enable us to promote the service to those not currently making use of the scheme, therefore attempting to increase social mobility for disabled residents. As such, this proposal is of high relevance to, and will have a positive impact on, Disability.</p>	High	Positive
	<p><b>Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15</b></p> <p>Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may</p>	High	Positive

		mitigate the need to implement any additional changes to the scheme which may have a negative impact on users.		
	Gender reassignment	<p>Data is not available regarding gender reassignment amongst users. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is, in general, of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of gender reassignment.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p>	Various	Various
	Marriage and Civil Partnership	The law does not require service providers to take into account the impact of what they do on married people and civil partners. The law does require public authorities to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.	Unknown	Unknown

		<p>However, if a service is provided to married people, protection from sexual orientation discrimination requires that the same service and standards must also be provided to people who are civil partners.</p>	Various	Various
		<p>Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.</p> <p>Data is not available regarding marital or civil partnership status amongst users and the service is not provided on different grounds to married people or to civil partners. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is, in general, of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p>		
<p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of marriage and civil partnership.</p>	Unknown	Unknown		
<p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled</p>				

		people and so directly help those people to access the scheme.									
	Pregnancy and maternity	<p>For clarification, pregnancy is not a disability under the Equality Act 2010. Data is not available regarding pregnancy and maternity amongst users. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of pregnancy and maternity.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p>	Various	Various							
	Race	<p>The ethnic groups of Taxicard users compared to the mid year population estimates for 2009 is illustrated below:</p> <table border="1" data-bbox="734 1364 1821 1430"> <thead> <tr> <th>Ethnic group</th> <th>Taxicard Users</th> <th>Borough Profile</th> <th>Officer comments</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Ethnic group	Taxicard Users	Borough Profile	Officer comments					Unknown
Ethnic group	Taxicard Users	Borough Profile	Officer comments								

	White	877 (39.5%)	129,000 (76%)	Compared to the borough profile, active Taxicard users who identify as White are under-represented by half.		
	White British	575 (25.9%)	106,700 (62.9%)	Compared to the borough profile, active Taxicard users who identify as White British are under-represented by more than half		
	White Irish	99 (4.5%)	5,300 (3.1%)	Compared to the borough profile, active Taxicard users who identify as White Irish are over-represented by over a third		
	White Other	74 (3.3%)	16,900 (10%)	Compared to the borough profile, active Taxicard users who identify as White Other are under-represented by around two thirds		
	Black Caribbean	133 (6.0%)	6,300 (3.7%)	Compared to the borough profile, active Taxicard users who identify as Black Caribbean are over-represented by almost half		
	Black African	86 (3.9%)	7,600 (4.5%)	Compared to the borough profile, active Taxicard users who identify as Black African are slightly		

				under-represented: by just over half a percentage point		
	Black Other	15 (0.7%)	1,400 (0.8%)	Active Taxicard users who identify as Black Other are broadly the same as the borough profile, with just 0.01% less of this group represented in the service user group		
	White and black Caribbean	39 (1.8%)	1,800 (1.1%)	Compared to the borough profile, active Taxicard users who identify as White and Black Caribbean are slightly over- represented, with 0.07% more of this group represented in the service user group		
	White and black African	24 (1.1%)	1,000 (0.6%)	Compared to the borough profile, active Taxicard users who identify as White and Black African are over-represented by almost half		
	Indian	48 (2.2%)	6,900 (4.1%)	Compared to the borough profile, active Taxicard users who identify as Indian are under- represented by almost half		
	Pakistani	58 (2.6%)	2,900 (1.7%)	Compared to the borough profile,		

				active Taxicard users who identify as Pakistani are over-represented by almost half		
				Compared to the borough profile, active Taxicard users who identify as Bangladeshi are largely under-represented, by over a percentage point		
	Bangladeshi	4 (0.1%)	1,800 (1.1%)			
				Compared to the borough profile, active Taxicard users who identify as Chinese are largely under-represented, by over a percentage point		
	Chinese	3 (0.1%)	2,500 (1.5%)			
				Compared to the borough profile, active Taxicard users who identify as White and Asian are under-represented by almost half a percentage point		
White and Asian	8 (0.4%)	1,800 (1%)				
			Compared to the borough profile, active Taxicard users who identify as Asian Other are slightly over-represented			
Asian Other	42 (1.9%)	2,200 (1.3%)				
			Compared to the borough profile, active Taxicard users who identify as Other			
Other ethnic group	137 (6.2%)	2,900 (1.7%)				



				Ethnic Group are over-represented by over two-thirds		
	<p>In summary, the race groups that are under-represented in Taxicard service users are:</p> <p>White  White British  White Other  Indian  Bangladeshi  Chinese  White and Asian</p> <p>In summary, the race groups that are over-represented in Taxicard service users are:</p> <p>White Irish  Black Caribbean  Black African  White and Black Caribbean  White and Black African  Pakistani  Asian Other  Other Ethnic Group</p> <p>The one race group that is broadly the same as the Taxicard service user group is Black Other.</p> <p>Further analysis is given below, and officers note that overall, increases in fares will impact more on those service users in the race groups identified above as being over-represented in the Taxicard service user group as compared to the borough profile. The changes proposed will be proportionately of more relevance to those disabled people in the race groups</p>					

	<p>that are over-represented. Because of this, officers consider the first two proposals to be of high relevance to Race, as some race groups could be differently affected by the proposals. Similarly proposal four and five from April 2014 will have a high relevance to race. Officers consider the third proposal to be of low relevance to race, as the automatic criteria are based on disability only (see below).</p> <p><b>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</b></p> <p><b>Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012</b></p>	High	Negative
	<p>Officers note that residents from some ethnic minority communities may earn less than others, and this could account for the numbers of disabled people in the race groups listed above that are over-represented in Taxicard users. The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on their ability to maximise use of the service. In particular, each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.</p>	High	Negative

	<p>A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change.</p> <p>Officers consider that increasing charges could have a negative effect on disabled people from some ethnic groups' ability to pay. A review to measure the impact of the changes after year one and reflect on these for further recommendations will help to assess impact after initial changes are made.</p> <p><b>Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1</b></p> <p>Expanding the automatic eligibility criteria for the scheme is based on disability, in line with the purpose of the scheme. It is unlikely that a set of criteria that takes race into account could be devised, as the scheme needs to meet the needs of disabled people. As such, this is of low relevance to Race and any impact on race groups is expected to reflect the needs of disabled people within all race groups. This would have a small positive effect on Race.</p>	Low	Positive
	<p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular. Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people.</p>	Unknown	Unknown
	<p><b>Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.</b></p> <p>Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances.</p>	High	Positive up to 2014/15 Negative thereafter

Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe and therefore the relevance of the proposal and impact on the protected characteristics of these users is unknown.

Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above, this is likely to have a negative impact on disabled or elderly people from some ethnic groups' ability to pay.

Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change and also supported a gradual implementation process.

By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to

	<p>signpost residents to other providers if they are no longer eligible or need a greater level of service.</p> <p><b>Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.</b></p> <p>The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently take more than 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year, which remains greater than the current average usage for active users. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.</p> <p>By deferring the decision apply a monthly trip limit officers have attempted to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.</p> <p><b>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</b></p> <p>The above recommendation was considered following the consultation in</p>	High	Positive up to 2014/15 Negative thereafter
		Low	Positive
		Low	Positive

		<p>which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and freedom pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.</p>		
	Religion/belief (including non-belief)	<p>Data is not available regarding religion or belief and non-belief amongst users. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of religion or belief, or who have different religious or philosophical beliefs.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but</p>	Various	Various
				Unknown
			Various	Various

		also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.		
	Sex	<p>There is a disproportionate number of females currently accessing the Taxicard scheme. This is likely to be a result of the greater proportion of users being in the 65+ age group and the longer life expectancy of women. The changes proposed will therefore be proportionately of more relevance to disabled women. Because of this, officers consider the first two proposals to be of high relevance to Sex, as women will be affected more by the proposals. Officers consider the third proposal to be of low relevance to Sex, as the automatic criteria are based on disability only (see below).</p> <p><b>Recommendation 1: To increase the minimum user charge by £1 per trip from January 2012; and</b></p> <p><b>Recommendation 2: To reduce the council's subsidy contribution by £2 per trip from January 2012</b></p> <p>Recommendations 1 and 2 may have a greater impact on female users considering the fact that women are likely to earn less over their lifetimes, live longer, and be on lower incomes. The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on their ability to maximise use of the service. In particular, each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously, users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip</p>	High	Negative
			High	Negative

	<p>user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. The financial impact of implementing the two recommendations above for the maximum trip user is £294.10 per year, for the average trip user is £166.84 per year and for the minimum trip user is £31.11.</p> <p>A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on female users' ability to pay. However, the majority of the users are in receipt of benefit and the programme is not means tested.</p> <p><b>Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility from January 2012, as set out in paragraph 4.1</b></p> <p>Expanding the automatic eligibility criteria for the scheme is based on disability, in line with the purpose of the scheme. As such, this is of low relevance to Sex and any impact on Sex is expected to reflect the needs of men and women disabled people. This would have a small positive effect on the protected characteristic of Sex.</p>	Low	Positive
	<p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any more men than women, or more women than men. In other words, if this number could consist of individuals with the protected characteristic of Sex.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected</p>	Unknown	Unknown



		<p>characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p> <p><b>Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.</b></p> <p>Ending double swiping does not mean that users are no longer able to travel longer distances, but this cost will have to be met by the user. This will therefore have a financial impact on users wishing to travel longer distances. Officers have considered that the scheme is intended for local travel and not to meet all the transport needs of users. Only 16% of trips are currently double swiped, although we do not have a breakdown of the profile of specific users who frequently double swipe.</p> <p>Officers have provided some examples of the potential individual financial impact of the recommended changes on a range of users using the current user figures and assuming that current user trends remain the same (see 11.1.7 of the Cabinet Report). This analysis has looked at the maximum trip user (all 104 trips allocated), an average active trip user (59 trips) and a minimum trip user (defined as less than 12 trips per year), assuming that they would still be eligible under the new eligibility criteria. From April 2014, the financial impact of implementing double swiping for the maximum trip user is an additional £170.00 per year, for the average trip user £96.44 per year and for the minimum trip user £17.98 per year. This is based on the assumption that 16% of trips are currently double swiped. As noted above is likely to have a negative impact on female elderly or disabled residents who may be on a fixed income.</p> <p>Officers have recommended deferring the implementation of ending double swiping until April 2014 in order to reduce this negative impact. This recommendation has considered the responses to the consultation which noted that ending double swiping is the least preferred change and supporting a gradual implementation process.</p>	High	Positive up to 2014/15 Negative thereafter

		<p>By deferring the decision to end double swiping officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, is recommended that the scheme is managed by H&amp;F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.</p> <p><b>Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.</b></p> <p>The financial saving attached to applying monthly trip limits assumes that user activity will remain the same and therefore the cost of journeys for those users that currently take more that 8 trips per month represents a saving to the council. It is difficult to calculate the exact financial impact on those individual users. It is noted that currently users only use on average 29 trips a year (or 59 for active users) of the 104 provided. Under the proposed changes users would have access to 96 trips per year, which remains greater than the current average usage for active users. Officers have noted that applying monthly trip limits does affect the flexibility of the scheme. Recognising the impact on the flexibility of the scheme officers have recommended that the implementation of this recommendation is deferred until April 2014.</p> <p>By deferring the decision apply a monthly trip limit officers have attempted to mitigate the impact of the initial changes. From April 2014 introducing a monthly trip limit will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than making changes to trip limits. However, officers have considered that any Taxicard scheme should continue to target</p>	High	Positive (up to 2014/15, negative thereafter)

	<p>vulnerable users and ensure that as many people as possible can benefit. Some responses to the consultation also recognised the merit in applying trip limits, which will assist users in managing the number of trips allocated throughout the year.</p> <p><b>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</b></p> <p>The above recommendation was considered following the consultation in which the introduction of a robust assessment and review process was recommended by the Hammersmith and Fulham Disability and Consultative Forum in their response to the consultation. It is proposed that the eligibility of all Taxicard users will be reviewed every two years. It is also proposed that the Taxicard database is sent on a regular basis to the national fraud initiative (as with Blue Badge and freedom pass databases). This will help to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.</p> <p><b>Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15</b></p> <p>Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may mitigate the need to implement any additional changes to the scheme which may have a negative impact on users.</p>	low	Positive
	<p><b>Recommendation 6: To review the eligibility of Taxicard users every two years and to send the Taxicard database on a regular basis to the national fraud initiative.</b></p>	High	Positive
	<p><b>Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15</b></p>	Various	Various
Sexual Orientation	Data is not available regarding sexual orientation in relation to Taxicard. As noted elsewhere, service users must have a disability as per the eligibility criteria in order to be able to access the scheme. Therefore, this protected characteristic is of low relevance to the proposals. However, the proposals may have various impacts on disabled people within this group, as given under Age, Disability, Race and Sex and as such could be of various	Various	Various

	<p>relevance.</p> <p>Based on figures available, officers estimate that reducing the non-automatic criteria would mean that 211 active users are no longer eligible for the Taxicard scheme. This is based on the known number of users that would be automatically eligible under the new criteria. Officers do not know whether the 211 users that would no longer be eligible would consist of any group in particular, or if this number could consist of individuals with the protected characteristic of religion or belief.</p> <p>Officers note that by expanding the eligibility criteria and removing the non-automatic eligibility, the changes to the scheme aim to ensure services for disabled people reach disabled people. It is noted in the Cabinet Report that this was not popular during consultation and as such there could be a negative effect on that group of 211 individuals, whose protected characteristics, are not known. However, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme.</p>	Unknown	Unknown

**Human Rights and Children's Rights**

Will it affect Human Rights, as defined by the Human Rights Act 1998?

Yes

Providing ways to access accessible transport for disabled people could increase access to education (article 14) and freedom to join and access associations/organisations (Article 11). Increasing independence of travel could also enhance the right to participate in free election (Article 3 of Protocol 1)

Will it affect Children's Rights, as defined by the UNCRC (1992)?

Yes

Providing ways to access accessible transport for disabled children could increase access to development opportunities, including education, leisure, culture and the arts. The service promotes the rights of disabled children by increasing social mobility and independence.

<b>Section 03</b>	<b>Analysis of relevant data and/or undertake research</b>
<b>Documents and data reviewed</b>	<p><u>LBHF Consultation</u>  In light of the proposed funding reductions from TfL, London Councils presented a list of recommended changes to local authorities' Taxicard schemes. Hammersmith and Fulham Council made the decision to consult with service users and therefore the proposed changes to the Taxicard scheme have been made in consideration of the consultation process which took place from 25<sup>th</sup> March 2011 to 6<sup>th</sup> May 2011. There were 909 responses to the consultation. A full list of responses is available in Appendix 7 to the Cabinet Report. During that time, focus groups with service users and others also took place. Particular organisations, offering services to disabled persons were targeted, including H&amp;F day centres Hammersmith and Fulham Action on Disability (HAFAD), Better Government for Older People (consultative forum), Age UK, Citizens advice bureau, Hammersmith and Fulham Disability and Consultative Forum.</p> <p><u>Complaints and Comments</u>  Through the consultation process a number of complaints and comments were noted by service users. These have influenced the proposed changes to the Taxicard policy. These recommendations have been considered alongside additional suggestions noted in section 4.2 and 4.3 of the cabinet report to improve the quality of the scheme for users. This includes lobbying London Councils to improve the monitoring and quality of their contract with Computer Cab and ensure no unnecessary charges are passed onto users. Further information is given at Appendix 5, which offers a list of complaints from the consultation.</p> <p><u>Mid Year Population Estimates</u>  Data has been compared to that of the Mid Year Population Estimates for 2009, which can be accessed here: <a href="http://www.lbhf.gov.uk/Directory/Council%20and%20Democracy/Plans%20performance%20and%20statistics/Statistics%20and%20census%20information/Census%20information/7057%20Demographic%20Data%20for%20Hammersmith%20and%20Fulham.aspx">http://www.lbhf.gov.uk/Directory/Council and Democracy/Plans performance and statistics/Statistics and census information/Census information/7057 Demographic Data for Hammersmith and Fulham.aspx</a></p>
<b>New research</b>	<p>New research was not considered necessary, as we conducted a public consultation, available in Appendix 6 to inform the proposals. We have, however, included information on what other London boroughs have done (see Appendix 4)</p>

<b>Section 04</b>	<b>Undertake and analyse consultation</b>
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<p><b>Consultation</b></p>	<p>The consultation on the proposed changes to the Taxicard scheme took place between 25 March 2011 and 6 May 2011. The new, single public sector equality duty came into effect on 6 April 2011. The public consultation included a questionnaire sent by post to all users of the H&amp;F Taxicard scheme as well as series of focus groups, listed in Appendix 9. A summary of the consultation results is at section 5 of the Cabinet Report.</p> <p>Respondents were asked to rate possible changes to the scheme. 62% of respondents voted not to make any changes to the scheme as their most preferred option.</p> <p>Changes to the eligibility criteria (see 4.1 of the Cabinet Report) was more preferred than the changes suggested by London Councils (see section 3 of the Cabinet Report).</p> <p>71% of respondents put their least preferred option as ‘to no longer run the scheme’.</p> <p>The most preferred change was to increase the minimum user charge by £1 with 52% of respondents rating this as their most preferred change. The least preferred change was to end double swiping, with 36% of respondents rating this as their least preferred change. Ending double swiping was further recognised as the least preferred option in the response to the consultation from the Hammersmith and Fulham Disability and Consultative Forum, a service user group. The Hammersmith and Fulham Disability and Consultative Forum further noted the need for flexibility, supporting annual rather than monthly trip limits.</p> <p>In the comments from respondents a repeated suggestion was to introduce the changes gradually.</p> <p>In addition, see “Consultation on H&amp;F Taxicard” at Appendix 7, and the analysis of all nine protected characteristics in Section 02 of this EIA.</p>
<p><b>Analysis</b></p>	<p>Officers have used the evidence from the consultation to inform the recommendations. These are detailed in section 7 of the Cabinet Report.</p> <p>Officers believe the recommendations enable H&amp;F to target the service to those who most need it whilst giving confidence that the council can continue to operate the scheme whilst mitigating the reduction in funding from TfL.</p> <p>Officers have recommended that the minimum user charge is increased by £1 recognising that this was the most preferred solution identified in the consultation.</p> <p>Officers have recommended that the subsidy is reduced, recognising that this was not the least preferred</p>

solution by users and the additional contribution that this would make to reducing the potential overspend.

Officers have expanded the automatic eligibility as a result of a review of service users and the intended target group. Changes to the eligibility criteria was recognised in the consultation as a more preferred solution than the options suggested by London Councils. In addition, officers believe the changes to the eligibility reflect the need identified in the consultation for a robust assessment of eligibility to support the Taxicard scheme, whilst also offering significant savings to reduce the overspend. As noted in 4.1.4, the Blue Badge eligibility and criteria for assessment are long established and are based upon legislation with clear guidance from the DfT. There is also an appeals process. This should give the Taxicard scheme eligibility more substance based upon established principles.

Officers have recommended not ending double swiping immediately recognising that this was the least preferred option from the consultation. This also reflects the repeated suggestion to introduce changes gradually.

Officers have not recommended introducing monthly trip limits immediately in order to maintain the flexibility of the scheme for as long as possible.

Officers have considered the negative impact on users following the introduction of these additional changes from April 2014. This has been considered alongside other council priorities and the councils overall financial position. The council is committed to retaining its financial contribution to the Taxicard scheme for the next three years, despite a number of efficiencies being made elsewhere.

By deferring the decision to end double swiping and applying monthly trip limits officers have attempted to mitigate the impact of the initial changes. From April 2014 ending double swiping and introducing trip limits will have an additional negative impact on users. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping or introducing trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. In addition, it is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

Officers have recognised the limitations of the data which uses 2010/11 user activity to make financial predications over a four year period. Officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15.

These recommendations have been considered alongside additional suggestions noted in section 4.2 and 4.3 to

improve the quality of the scheme for users. This includes lobbying London Councils to improve the monitoring and quality of their contract with Computer Cab and ensuring no unnecessary charges are passed onto users.

Section 05	Analysis of impact and outcomes
Analysis	<p>The recommendations would enable H&amp;F to target the service to those who most need it whilst giving confidence that the council can continue to operate the scheme and mitigating the reduction in funding from TfL</p> <p>Section 02 gives the analysis for each protected characteristic. This section analyses the proposals considered above and their overall relevance to, and impact on, the protected characteristics as a whole.</p> <p><b>Recommendation 1: To increase the minimum user charge by £1 per trip from £1.50 to £2.50 from January 2012</b></p> <p><b>Recommendation 2: To reduce the Council's subsidy contribution by £2 per trip from January 2012</b></p> <p>As given above, these two proposals will be of high relevance to:</p> <ul style="list-style-type: none"><li>▪ Age groups, and those aged over 65 in particular</li><li>▪ Disability: disabled people</li><li>▪ Race: different race groups</li><li>▪ Sex: this will have more relevance to women than to men</li></ul> <p>The proposed increase in minimum fare and reduction in maximum tariff could negatively impact on users' ability to maximise use of the service. Each trip will cost a minimum of £1 more per journey and if users want to make a longer journey, under the proposed changes to tariffs, users will be expected to pay after the meter has reached £8.30. Previously users would not be charged until the meter reached £10.30 (there are variations depending on the time of day travelled). This does not prevent the users making longer journeys but less of the journey will be subsidised.</p> <p>A majority of respondents (52%) stated that an increase in the minimum charge from £1.50 to £2.50 would be their most preferred change. Officers consider that increasing charges could have a negative effect on those groups. This negative impact will be reduced by not ending double swiping immediately.</p> <p><b>Recommendation 3: To expand the automatic eligibility criteria and remove non-automatic eligibility</b></p>



**from January 2012, as set out in paragraph 4.1**

As given above, this proposal will, in the main, be of high relevance to:

- Age groups, and those aged over 65 in particular
- Disability: disabled people

This is due to the fact that the proposed, expanded eligibility criteria will include the following:

- Blue Badge eligibility
- Higher rate attendance allowance.

More detail is given above in section 02 under Age and Disability. These will replace the non-automatic criterion of the doctor medical assessment form. Officers note that removing the doctor medical assessment form was not popular during consultation, however, officers have considered the DfT guidance (outlined in the Cabinet Report) and consider the removal of a doctor's certificate to be positive not only because is there a charge, but also because the new criteria are specifically targeted towards disabled people and so directly help those people to access the scheme. As noted, a large number of these people will also be older (over 65)

This proposal will also have an effect on 211 users who will no longer be eligible. It is not known if this number will consist of any group in particular and so it may have a relevance to, and negative impact on some or all of the following protected characteristics:

- Gender reassignment
- Marriage and civil partnership
- Religion or belief (including non-belief)
- Pregnancy and maternity
- Race
- Sex
- Sexual orientation

However, service users must have a disability in order to be able to access the scheme, and the Equality Act permits the Council to treat disabled people more favourably than non-disabled people. The eligibility criteria applies lawful discrimination as the scheme is only open to those residents with a physical disability.

**Recommendation 4: In response to the public consultation, to maintain double swiping until April 2014.**

**Recommendation 5: In response to the public consultation, to maintain the current annual trip limit until April 2014 when a monthly trip limit of 8 trips per month, as set out in paragraph 3.4, will be introduced.**

As given above, these two proposals will be of high relevance to:

- Age groups, and those aged over 65 in particular
- Disability: disabled people
- Race: different race groups
- Sex: this will have more relevance to women than to men

By deferring the decision to implement this recommendation until April 2014 will initially have a positive impact on the above groups. Following 2014/15 implementation will have a negative impact, as detailed above, particularly in terms of an increased financial burden and a negative impact on the flexibility of the scheme for users. It is recommended that the scheme is managed by H&F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible or need a greater level of service.

**Recommendation 6: To review the eligibility of Taxicard users and send the Taxicard database to the national fraud initiative every two years.**

This recommendation has been assessed under Age, Disability, Race and Sex. A greater level of analysis is under Disability as it will only be the details of disabled people that are sent as part of this proposal. It is therefore considered that this will be of high relevance to disabled people, and that it will be positive since it helps to protect the scheme from fraud and therefore ensure that it is targeted at those who require it.

This will also enable the Council to promote the service to those not currently making use of the scheme, therefore attempting to increase social mobility for disabled residents. As such, this proposal is of relevant to Age, Disability, Race and Sex, and will have a positive impact on those protected characteristics. Overall though, the proposal will have the most relevance to and impact on, Disability because the information sent will be that of disabled people.

**Recommendation 7: To carry over any unused contingency in the Taxicard scheme budget until 2014/15**

Recognising the negative impact of the proposed changes on users, officers have recommended that any unused contingency in the Taxicard scheme budget is carried over until 2014/15, which may or may not happen. This may mitigate the need to implement any additional changes to the scheme which may have an additional negative

impact for the above groups detailed above.

<b>Section 06</b>	<b>Reducing any adverse impacts</b>
<b>Outcome of Analysis</b>	<p>Given the overall summary detailed at section 05, it is considered that the proposals will be of most relevance to the following protected characteristics (in order of relevance):</p> <ol style="list-style-type: none"><li>1. Disability</li><li>2. Age</li><li>3. Sex</li><li>4. Race</li></ol> <p>The increased charges that are proposed at recommendations 1 and 2 could be negative for all of the above. However, alongside the following, officers consider that the impact may be mitigated or even removed until 2014/15 by:</p> <ul style="list-style-type: none"><li>▪ not removing double swiping immediately</li><li>▪ expanding the automatic eligibility criteria</li><li>▪ reviewing eligibility of users every two years and sending information to national fraud database</li></ul> <p>After 2014/15, ending double swiping and introducing monthly trip limits is predicted to have an additional negative impact for the aforementioned protected characteristics. Officers could have raised the eligibility criteria further in 2014 in order to meet the financial challenges, rather than ending double swiping or applying monthly trip limits. However, officers have considered that any Taxicard scheme should continue to target vulnerable users and ensure that as many people as possible can benefit. Moreover, it is recommended that the scheme is managed by H&amp;F Direct who would have knowledge of alternative providers of services and would therefore be able to signpost residents to other providers if they are no longer eligible for a Taxicard or need a greater level of service.</p> <p>Criteria for accessing the Taxicard scheme will now also be assessed using the Blue Badge eligibility criteria, which includes a mobility assessment. The Blue Badge eligibility and criteria for assessment are long established, are based upon legislation with clear guidance from the DfT. This will give the Taxicard scheme eligibility more substance based upon established principles. If users do not pass the mobility assessment but</p>

believe they are eligible for a Taxicard an appeals process will apply. Following the transition process, the framework for appeals for new applicants will be aligned with the councils Blue Badge appeal process managed by the Head of Service for Blue Badges & Freedom Passes (Finance and Corporate Services).

Additional suggestions have been made in the cabinet report at section 4.2 and 4.3 to improve the quality of the scheme for users. This includes lobbying London Councils to improve the monitoring and quality of their contract with Computer Cab to ensure no unnecessary charges are passed onto users. In addition It is recommended that information should also be provided to users to inform them that the taxi will start charging from the moment it arrives at the pick up point and therefore users should ensure they are ready at the arrival time to avoid any unnecessary charges.

A number of Taxicard users commented that the reason they used their Taxicard for hospital visits was because the NHS provision available took too long to get to the required destination, was un-reliable and that one could not guarantee that they would make their appointment in time. It is suggested that these complaints are passed onto the NHS transport team and a discussion about possible improvements to the NHS service and/or the potential of aligning provision with the Taxicard scheme is considered.

<b>Section 07</b>		<b>Action Plan</b>					
<b>Action Plan</b>		Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
		Inform users of changes	Communicate changes to current users in conjunction with London Councils	Following Cabinet decision – 2 months notice to be provided to users.	Natalie Luck	Users informed of changes to the Taxicard scheme	25/8/11

<b>Section 08</b>		<b>Agreement, publication and monitoring</b>	
<b>Chief Officer sign-off</b>		Name: Gill Sewell	

	Position: Assistant Director, Children, Youth and Communities Email: <a href="mailto:gill.sewell@lbhf.gov.uk">gill.sewell@lbhf.gov.uk</a> Telephone No: 0208 753 3608
<b>Key Decision Report</b>	Date of report to Cabinet: 10 / 10 / 11 Confirmation that key equalities issues found here have been included: Yes
<b>Opportunities Manager for advice and guidance only</b>	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 12 September 2011 Email: <a href="mailto:PEIA@lbhf.gov.uk">PEIA@lbhf.gov.uk</a> Telephone No: 020 8753 3430