

# **Equality Impact Assessment (EIA)**

## **Business Travel Policy – Travel Plan**

### **Equality impact, needs and requirements assessment form**

Please use this form to record your findings, proposed actions, equality objectives and targets. Use the guidance notes to help you do the assessment or contact the Equality Standard Project Manager if you need some advice

**About the policy, practice, service or function you are assessing**

Name of policy, practice, service or function: **Business Travel Policy – Travel Plan**

Assessment team leader name: **Karen Jewell**

Date of assessment: **5<sup>th</sup> August 2009**

Department responsible: **Corporate HR**

Service Area: **All**

Other members of assessment team:

<b>Name</b>	<b>Position</b>	<b>Area of expertise</b>	<b>Comments</b>
Ann Webster	Equalities Consultant	All equality issues	
Maggie Fennell	Chair of DEN and UNISON rep for equalities		
Karen Jewell	HR Consultant, Travel Plan	HR and the travel plan	
Clare Harrison	Project Officer, Travel Plan	Travel plan and car share	
Penny Sutton	Project Officer, Travel Plan	HR and the travel plan	

Question	Response/ findings
<p>What are the main aims and objectives or purpose of the policy, practice, service or function that you are assessing?</p>	<ol style="list-style-type: none"> <li>1. To deliver £807,000 savings</li> <li>2. To address the inequalities of the current system</li> <li>3. To reduce CO2 emissions</li> <li>4. To manage occupational road risk</li> </ol> <p>The New Business Travel policy aims to rationalise the use of the “grey fleet” for business travel by DCC employees. In so doing provide cleaner and safer modes of transport for staff who need a car to carry out their work and for service users. Derby is an air quality management area and key to improving environmental conditions is to reduce the impact of traffic by encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. Additionally there is a need to address the health and safety risks posed by the relatively uncontrolled use of private cars on council business.</p> <p>Of concern are the inequalities of the existing system. The new policy creates a fairer system for all by removing the distinction between essential and casual user and implementing the HMRC approved rate of 40p per mile.</p>

<p>Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person, team, department, or body – and include any outside organisations who deliver under procurement arrangements</p>	<p>Managers are responsible for deciding whether employees should use their own vehicle for business travel in the first instance and secondly whether they should receive essential car user allowance or whether they can claim casual mileage rates. In the past some managers have used the essential car user allowance as a means of enhancing pay where recruitment to a particular post has been difficult.</p> <p>Also in 1997 when certain functions of the County Council were merged with the City Council the intention was to deal with the many anomalies between employees as regards car user status and this has not been addressed until now.</p>
<p><b>Question</b></p>	<p><b>Response/ findings</b></p>

Who is affected by the policy, practice, service or function, or by how it is delivered? Such as, who are the external and internal customers, groups, or communities?

Any employee who uses their own vehicle to travel on business is affected. Also affected are those service users who are transported by DCC employees or who receive a service from employees who use their own car to deliver that service. Employees who use their own car may have concerns about making their own car available in this way and may believe that an alternative vehicle could provide a safer and/or better, more appropriate service to users. Users themselves may have concerns about what is currently offered to them but may feel that they are not in a position to voice those concerns.

Employees with disabilities who need to be mobile are also affected; they may use taxis or their own specially adapted cars to do their job.

Job applicants may be affected when a person specification states that someone must have their own car to be considered for a position; this may especially impact trainees and people on low incomes.

<p>What outcomes do we want to achieve, why and for whom?  For example, what do you want to be providing, how well, what changes or improvements, and what should the benefits be for customers, groups or communities?</p>	<p>We want to exceed our customers' expectations of the service we provide by providing safer and more dignified transport where we can. We want to reflect the diverse needs of both our employees and our service users.</p> <ul style="list-style-type: none"> <li>• We want to achieve the £807,000 savings</li> <li>• We want to create a fairer system for business travel</li> <li>• We want to reduce CO2 emissions</li> <li>• We want to reduce occupational road risk for employees and service users.</li> </ul>
<p><b>Question</b></p>	<p><b>Response/ findings</b></p>

What existing or previous inspections of the policy, practice, service or function are there? For example, Best Value Inspections, policy reviews, research into the effects of a policy or practice.

What did they tell you?

The Energy Saving Trust and G-Fleet Consultants did a health check of the “grey fleet” (employees own cars used for business purposes).

What became clear was that every business mile was costing, on average, 80p, that we are relying on employees to use their own cars for work, in some cases relying on their discretion as to whether a car was suitable for the purpose of transporting service users or hazardous equipment. The mileage profiles between casual and essential car users were very similar with the average essential car user doing between 1,000 and 1,500 miles per annum. Many of those employees getting essential car allowance were full time employees and in contrast a large group of female part timers, Home Care Assistants, were getting the public transport rate of 12.7p per mile. In fact there were several different types of mileage payment based on different rationales and not forming a coherent system based on objective need.

G-Fleet also recorded the following concerns:

“Essential” status would appear to be weighted towards full-time staff

“Essential” status would appear to be weighted towards higher paid staff

Both essential user allowances and mileage payments attract tax and national insurance contributions.

<b>Identifying potential equality issues and factors</b>	
<b>Question</b>	<b>Response/ findings</b>
<p>What do you already know about the equality impact or need? For example, from research, feedback, consultation or any performance monitoring</p>	<p>From research we already know that there are inconsistencies in the way in which the current business travel policy has evolved across the organisation. Some services have a culture of providing fleet vehicles to staff thus avoiding the need for use of private vehicles altogether. Other staff receive essential car user allowance whereas staff doing similar (or more) miles per week on business receive only casual mileage rates.</p> <p>Some of the lowest paid workers Home Care Assistants, (almost exclusively female and part time) have limited access to casual car user mileage allowance and are generally in receipt of the lowest allowance, “public transport rate”. This is in part due to the fact that it is argued that Home Care Assistants do not need a car to carry out their work. However there are times when managers sanction the use of a private vehicle and pay mileage at casual car user rate; i.e. when the staff are working from home on “second call out” or out of locality.</p> <p>What became clear very quickly was that in the light of these inequalities, “do nothing” was not an option.</p>
<b>Question</b>	<b>Response/ findings</b>



Is there any evidence of higher or lower take up under the policy or practice, or of the service or function for any particular groups? For example, who uses the service, who doesn't and why not?

As above- there are different cultures and practices around car and van use and different departments pay different rates. There are some employees in receipt of essential car user allowance who do not claim additional mileage payments as they feel that their allowance covers their current level of expenditure. There are some in receipt of Essential car user allowance that don't do mileage at all.

Vehicles provided by employees may not always meet the needs of the service user; for example, does a wheelchair user have to get out of their chair to access the car? This may mean a loss of dignity for some.



Have there been any important demographic changes or trends locally? For example is the population changing, and if so, how and what might that mean for the service or function?

The latest demographic research on Derby City shows that:-

Partnership published a piece of research in 2008 which gave us a better picture of the make up of Derby. It told us that the City's minority ethnic community is estimated to have increased from 15.6% in 2001 to 21.8% in 2007. The report also told us of the wide range of languages spoken in the city.

Whilst the number of older people in the local population continues to rise the way in which direct services to older people is now delivered means that Home Care Assistants are likely to have a wider geographical patch to cover. This is because after an initial assessment only the most dependent people will be cared for by DCC and the more able will be managed by the independent care sector.

Question	Response/ findings
<p>Is there an indication that any of the policies or practices involved with the service or function creates particular problems or difficulties for any groups of customers or communities?</p>	<p>It is imperative that the vulnerable service users whom DCC protects through the provision of children's' and adults' social services do not receive a less effective service because of changes to the business travel policy. Employees will still be able to use their own vehicle for authorised business journeys and be reimbursed at the HMRC approved rate of 40p per mile. However, the Council will also provide alternatives. These alternatives will be for high risk journeys. High risk journeys are those defined as:</p> <ul style="list-style-type: none"> <li>• transporting service users</li> <li>• hazardous equipment</li> <li>• High mileage journeys.</li> </ul> <p>The alternatives will range from short term hire cars to pooled vehicles to public transport depending on what is most appropriate to the situation.</p>

<p>What information or data exists? For example, statistics, customer feedback, complaints, research, monitoring – who keeps it and can you get hold of it?</p>	<p>Neighbouring local authorities are also moving or have already moved away from the “essential” and “casual” car user status system, for example, Derbyshire County Council.</p> <p>Feedback about the new system indicates that for some employees and their managers it will be a really positive step:</p> <p><b>Reduces financial hardship</b>  Anyone using a pool car would have a fuel card to pay for petrol instead of using their own money and claiming it back some time later.</p> <p>People who could not afford a car for work but who needed one may have the chance to use a pool car or short term hire car, depending on the number of miles they need to do</p> <p>The car share scheme offers an alternative opportunity for disabled employees to get to work without using public transport</p> <p><b>Cultural Fit</b>  It was mentioned that should an employee have a commitment to Friday prayers it may be possible to link up with a car share partner to facilitate shared transport.</p> <p>Age discrimination  To be able to remove “car owner” from person specifications would be a major step forward in combating indirect age discrimination as many young people could not afford a car and the new measures offer an alternative for</p>
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them.

**Location of Pool Cars**

This could be critical as feedback suggests employees are unhappy about cars being left overnight in certain locations. Also employees do not want to have walk lengthy distances to pick up pool cars, especially if they have a lot to carry.

**Risk Assessment**

A recent UNISON report regarding violence against Social Workers suggested that “Employers should have vehicles available for workers to use instead of their cars on high risk visits-once a worker’s car number-plates are identified it is easy for them to be followed and targeted.”

**Manager’s Understanding and Attitude**

The members of the Equality Impact Assessment panel said that one of the key factors to influence the success of the business travel measures would be the way in which managers handled the new policy with their employees. For example, managers needed to be sensitive to employees who felt uncomfortable driving an unfamiliar car & ensure they received awareness training from Fleet Management. They also needed to understand the way in which the car share scheme would work and what might happen if someone’s arrangements fell through.

**Wheelchair-friendly vehicles**

It was also mentioned that there are cars on the market Managers of individual services hold performance data and information on complaints.

<b>Question</b>	<b>Response/ findings</b>
Does any equality or diversity objectives already exist? If so, what are they and what is current performance like against them?	No equality or diversity objectives currently exist for this policy as it has been reliant on local, pragmatic application. This has led to inconsistencies within the organisation which our base data has highlighted.

Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?

As previously discussed, some part-time, female workers are disadvantaged in the present system and generally there is no consistency in the way in which posts are designated essential or casual.



## Collecting the information and data about how the policy, practice, service or function, impacts on communities

Please record your information and data in this table and think about:

what information or data you will need  
using both quantitative and qualitative data  
making sure that where possible there is information that allows all perspectives to be considered  
identifying any gaps in the information/ data and what it can tell you

<b>Data or information</b>	<b>When and how was it collected?</b>	<b>Where is it from?</b>	<b>What does it tell you? You need to consider all six equality strands where you can</b>	<b>Gaps in information</b>
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Customer feedback and complaints	We opened a mail box to employees to allow anyone affected to ask questions and put their points of view about the travel plan proposals and we have had hundreds of emails giving us feedback and complaints; most of these have been answered.	All employees across the Council	Few equality issues were raised. The issues that were raised were concerned with needing to use an automatic car; or in one case feeling uncomfortable using a strange car. We are able to offer automatic hire cars given sufficient notice and also employees are able to receive familiarisation training from Fleet Management should they need to use an unfamiliar hire car.	Employees who do not have access to email / derbynet.
Consultation and community involvement	Consultation and negotiation with the Trades Unions that represent the Council's workforce began in April 2009.	The Trades Unions representatives	The general issue of inequitable distribution of essential car user allowance was raised and this has been dealt with through the new , universal mileage rate in accordance with HMRC guidelines.	Employees who do not have access to a trade union representative.

Performance information including Best Value	The Energy Saving Trust and the G-Fleet “health check” has provided a baseline showing who travels business miles and how frequently and what they get paid for doing so. This data showed us the inequalities in provision for employees and also that the average payment per mile is twice that recommended by HMRC.	The Energy Saving Trust and G-Fleet Consultancy.	The collection of detailed data on employees’ mileage rates and travel patterns demonstrated the inequalities in the NJC system of essential and casual car users.	All employees who are paid essential car user allowance or who have claimed mileage since 2006 were included in the data collection and analysis. Anecdotally we discovered that some employees do business mileage but do not make claims for payment. We were unable to find out the extent of this .
Who is paid essential car user allowance and who claims business mileage. (take up and usage)	As discussed in impact assessment above.	Payroll.	See above.	See above.

<p>Comparative information or data where no local information is available.</p>	<p>Derbyshire County Council has already moved to the 40p per mile recommended by the HMRC and neighbouring authorities are considering or embarking upon making the same change. The Travel Plan Team also conducted an informal survey of over 50 English local authorities business travel arrangements which indicated that over half were considering changing from NJC arrangements. A minority already had done so.</p>	<p>Local research by the travel plan team.</p>	<p>Many other local authorities no longer found the NJC scheme “fit for purpose” and were considering or already making changes.</p>	
<p>Census, national or regional statistics</p>				

Workforce profile	On the Derby City Council website go to Community and living and then equality and at the bottom of the page you can click on employment statistics 2008-09 to see the City Council's workforce profile.		<p>The profile of the workforce by age, gender, disability, ethnicity, sexual orientation &amp; religion.</p> <p>The workforce population analysed by job grade.</p> <p>Who applies for jobs, who gets short-listed, who gets appointed by the 6 equality strands.</p>	
Where service delivered under procurement arrangements – workforce profile for deliverers	Under the Disability Discrimination Act providers of hire cars are now required to ensure that they can provide vehicles that meet special requirements; for example, automatic transmission, wheelchair accessible.	Central government legislation.	Each of the equality strands is covered by this legislation.	None.

Monitoring and scrutiny outcomes	See "SMART" objectives below			
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## Analysing the information and data and setting equality objectives and targets

Please give your detailed findings in this table

Service or function	Policy or practice	Findings	Which groups are affected and how	Whose needs are not being met and how?
Adults, Health and Housing	Local policy regarding Home Care Assistant use of own vehicle.		Home Care Assistants receive passenger transport rate for certain mileage	Home Care Assistants not being treated fairly.
Across the Council	NJC scheme for "Essential " and "Casual" car users	Lack of consistent criteria applied to who is designated casual and who is designated essential; some casuals do more mileage than essentials.	Female, part-time staff and other disparate groups and individuals.	Some staff are not treated fairly.

**Objectives - process, impact or outcome based**

Please give your proposed objectives/ targets in this table

<b>Objective/Target:</b>	<b>To ensure that where pool cars are used these are accessible to all employees who use them</b>
Specific	To ensure employees participating in pool car pilots are given the opportunity to fully state their needs
Measurable	Measurable against a statement of needs
Achievable	Departments can fund extra needs as part of reasonable adjustments
Relevant	As part of the equalities commitment in the Travel Plan
Timed	By March 2011

<b>Objective/Target:</b>	<b>To create a business travel system that is fair for all employees and is needs based</b>
Specific	Employees doing high mileage get access to short term hire or pool cars as appropriate
Measurable	The T&S system shows a reduction in mileage by employees
Achievable	The TU's work with operational managers to identify high mileage journeys
Relevant	The equality objective of the Travel Plan
Timed	For review 6 months after the installation of the new IT based T&S system

<b>Objective/Target:</b>	<b>To ensure all employees are reimbursed at the same rate for business miles</b>
Specific	Employees authorised to use own car receive 40p per mile
Measurable	The T&S system only has one rate of mileage payment
Achievable	The HMRC rate was implemented on July 1 <sup>st</sup> 2010.
Relevant	Reflects the government's recommended rate
Timed	Is implemented on 01/07.2010.