

EQUALITY IMPACT ASSESSMENT TEMPLATE

An Equality Impact Assessment (EqIA) is a review of a new or existing policy which establishes whether the policy has a differential impact on specific equality groups and identifies how the policy can help promote inclusion and improve equality of opportunity for different groups of people. The term policy is interpreted broadly and refers to anything that describes what we do and how we expect to do it. It can range from policies and procedures, to strategies, projects, schemes and everyday customs and practices that contribute to the way our policies are implemented and how our services are delivered. An EqIA aims at improving the WMCA's work, by promoting equality and ensuring that the proposed or existing policy promotes equality can benefit a wide range of people and will not disbenefit

DIRECTORATE	Transport for West Midlands
PEOPLE RESPONSIBLE FOR CONDUCTING AND OVERLOOKING ASSESSMENT	Edmund Salt, Bus Development & Partnerships Manager
NAME OR TITLE	Bus Service Improvement Plan (BSIP)
DATE OF COMPLETION	August 2021
DATE DUE FOR REVIEW	At next review stage
PERSON RESPONSIBLE FOR ARRANGING REVIEW AND MONITORING	Edmund Salt

A. ABOUT THE POLICY

1. Describe the main aims, objectives, activities and outcomes of the policy. Who is expected to benefit?

In line with funding requirements for the National Bus Strategy (NBS) for England, WMCA need to publish a Bus Service Improvement Plan (BSIP), by the 31st of October 2021.

The BSIP has been produced in partnership with bus operators, community transport bodies, local businesses, services and people. The BSIP identifies key objectives which will drive forward the improvement of the bus service across the West Midlands. The BSIP outlines how WMCA, in collaboration with the parties indicated above, will increase bus patronage, address poor integration with other transport modes as well as the under provision and overprovision of bus services; the workstreams that will deliver these objectives are indicated within the BSIP. The BSIP will be monitored and updated on an annual basis, it will also be reflected in Transport for West Midlands' Local Transport Plan.

The BSIP and the respective workstreams have been developed as a means of reforming our existing bus offer.

The main aim of the BSIP is to provide a high-level layout of WMCAs delivery ambitions when it comes to bus service reform across the region, identifying workstreams which will help support the delivery of a fully integrated service that is accessible for all. The proposals within the BSIP adhere to the priorities of NBS and has identified key targets for improvements including:

- Reliability and journey times
- Bus patronage
- Passenger satisfaction
- Fare affordability
- Perceptions of safety
- Operating costs
- Carbon emissions (and other bus emissions)
- Modal share

In order to fulfil these targets, different workstreams have been established with defined commitments identified. These are:

- **Intensive services and investment on key corridors, with routes that are easier to understand**
 - Establishing a 'turn-up-and-go' core network that supports key transport hubs and local centres; a local network that will provide links to local amenities, including employment, education, leisure and connections to the core network/ rail service.
 - Underpinning these networks will be a supporting network, consisting predominantly of the subsidised bus services, which adheres to the same principles as the core and local networks, as opposed to than solely providing essential means of travel (as currently delivered).

- **There will be significant increases in bus priority**
 - Investment will be put into the development of over 110km of new bus lanes with more cross-city bus priority to combat current issues around reliability, specifically punctuality and journey times
 - Target improvements around the length of journeys 4 miles or more
 - Expand the Sprint Bus Rapid Transit network

- **Fares will be lower and simpler**
 - Refine the approach to ticketing, alleviating complexities around multi-modal and multi-operator tickets.
 - Reduce the price of the nBus tickets to match that of National Express as well as aligning the price of single and return tickets across operators.
 - The removal of all other ticketing types – meaning the only ticketing range available would be nBus.
 - Proposal for TfWM to oversee the provision of ticketing retail

- **There will be seamless, integrated local ticketing between operators, and this will be across all types of transport**

- **Service patterns will be integrated with other modes**
 - Improvement of the bus network to ensure services align with light and heavy rail frequencies; making sure the first and last train times are met.
 - Assessing the potential for TfWM to centrally oversee the on-road management of the bus network via driver communication and Automatic Vehicle Location (AVL). This will build upon existing measures applied through the Regional Transport Coordination Centre (RTCC), which is already supported by local bus operators.

- **The local bus network is better presented as a single system that works together, with clear passenger information**
 - Consistent branding and presentation across the West Midlands public transport network (Bus, Metro, Rail and Sprint Bus Rapid Transit)
 - Enhanced Real Time Information, including information detailing 'next fastest service to' as well as the ability to communicate planned and unplanned disruption across the network
 - Accessible information, easy to understand for new/ infrequent users

- **Modern buses and decarbonisation**
 - In order to achieve the aims set out in WM2041, the WMCA decarbonisation strategy, buses across the West Midlands need to be, as a minimum, Euro VI standard. Funding from the BSIP will support the delivery of 100% of the bus fleet achieving this ambition by 2030.

- **Give bus passengers more of a voice and a say (inclusive of safer travel objectives, outlined below)**
 - A new Bus Passenger Charter to be developed in collaboration with bus operators and respective partners, including customer representation

Safer and more secure bus travel:

 - Improvements in information on health and safety and personal security, including easier methods of reporting incidents, with a greater focus on groups who may be more vulnerable and/or have a negative perception of safety.
 - Enhanced presence of capable guardians on the bus network, e.g. inspectors, and improved CCTV to offer reassurance to passengers
 - Improvements in measures for drivers, increased training for better on-board health and safety as well as allocated time and space for drivers to be supported when victims of crime, including the reporting process.
 - Building on existing projects designed to improve safety across the network inc. waiting areas and walking routes
 - Operating a collaborative approach to tackling crime and anti-scoail behaviour, increasing the powers available and addressing the underlying causes of such.

- **More demand-responsive services and ‘socially necessary’ transport**
 - Working to ensure that existing provision (Ring and Ride, West Midlands on Demand, Community Transport and Linked Provision) can be better integrated to improve efficiency.
 - Explore the longer-term potential of this provision, assessing how it can be utilised to be a more flexible, viable solution to socially necessary supporting services

- **Longer-term transformation of the network through Bus Rapid Transit and other measures**
 - Consider the potential of a ‘Future Bus Transport Zone’ that incorporates all existing projects, as well as new workstreams identified in the BSIP, such as Sprint Bus Rapid Transit and bus

decarbonisation, to promote bus as a viable alternative to other modes, particularly reliance on car.

- Being open to innovative trials and concepts to further enhance the attractiveness of bus as well as support the 'Mobility as a Service' ethos.

Ultimately, the aim is to enhance the bus offer across the region, placing bus as a practical alternative to car travel.

Benefit:

An increase in bus patronage will help drive further the BSIP proposals and result in continuous improvement of the bus network as well as other modes of public transport.

Prioritising bus across the network will help alleviate existing barriers customers have when it comes to using bus currently e.g. journey times and frequencies. Bus users will be more likely to remain loyal to the bus network which can have a confounding impact on congestion and journey times. Having bus as a strong contender against car usage will also likely influence patronage across other modes of transport, such as metro and rail, as well as the potential for the region to take up more active travel methods.

Conversely, if the workstreams identified within the BSIP don't adequately fulfil their objectives, whether this is due to funding or otherwise, there is a risk that the current bus offer of the West Midlands will decline (see evidence base below). Typically, the most vulnerable groups in society will be the most harshly impacted by any negative outcomes. This is all the more prevalent as these groups have also been disproportionately impacted by the Covid-19 pandemic, which has also increased their reliance on public transport.

B. EQUALITY RELEVANCE/IMPACT

2.Does the policy affect the public or employees directly or indirectly? In what ways?

The proposals outlined within the BSIP will have direct impact on citizens who use the Bus network across the West Midlands. In addition to this, the wider public will be indirectly impacted. The workstreams that are noted within the plan, if successfully delivered, will have confounding impacts on congestion across the West Midlands.

3. What information is available on the equality issues in the key target groups¹? (what inequalities, discrimination /and health inequalities currently exist in relation to the target groups? What information/data do you have that explains why these inequalities exist and how they are maintained?)

West Midlands demographics

The West Midlands has the second highest fertility rate of all UK regions. The population is projected to increase by 9.6% by 2038. The growing population is likely to become increasingly diverse. The changing population may result in the need for more infrastructure and pressure on the environment.

Race and Ethnic Background: The West Midlands Metropolitan area has the largest non-White regional population outside of London. Asian or Asian British is the ethnic group that makes up the biggest non-white proportion of the population. 69% of the population have a White British ethnic background, which compares to an average of 80.5% in England and Wales. Birmingham is the most ethnically diverse district (47% being minority ethnic groups), followed by Wolverhampton, Sandwell and Coventry. The two biggest ethnic minority groups are Pakistani (at 7.3%) and Indian (at 6.8%)². According to the University of Birmingham IRIS department, Birmingham is now classified as a 'Super diverse' city composing 187 different nationalities/ethnicities. There are distinct concentrations of minority ethnic communities within the metropolitan area.

Faith or Belief: People in the West Midlands Metropolitan area have a greater level of religious affiliation than in England overall. 53.8% of the population declared that they are Christian. This compares to 59.3% in England and Wales. 20.3% of the population declared that they have no religion, whilst 12.2% declared that they are Muslim.

Sex: The split between the sexes (50.5% female and 49.5% male) is similar to England and Wales.

Age: The West Midlands Metropolitan area has one of the highest proportions of population aged under 16 and a lower proportion of people aged over 65 compared with other regions. The mean age is 37.4 which compares to 39.4 in England and Wales. Birmingham specifically is described as the youngest city in Europe, with under 25s accounting for nearly 40% of the population. The West Midlands Metropolitan area also generally has a lower percentage of people aged 65+ with the exception of Solihull and Walsall that have higher proportions of people above retirement age than nationally.

¹ Equality target groups: Age, gender disability, race, religion and belief, pregnancy and maternity, socio-economic, sexual orientation

² These figures are based on Census 2011 data and are likely to be significantly higher once the next Census of 2021 is conducted

Sexual Orientation: 2.3% of the West Midlands population identified themselves as gay, lesbian or bisexual in 2018³. However, key organisations such as Stonewall estimate the figure to be higher at 5-7%.

Disability: The West Midlands Metropolitan area has a larger percentage of people in households with a limiting long-term illness (6% of households compared to 4.7% in England and Wales). It also has a slightly larger proportion of disabled people than England and Wales (19% versus 18% in England and Wales).

Deprivation

Indices of Multiple Deprivation

The 2019 Indices of Deprivation are used to analyse data across England, at a small, local area level, to measure deprivation. These figures take into account numerous factors including: income deprivation; employment deprivation; education, skills and training deprivation; health deprivation and disability, crime; barriers to housing and services and living environment deprivation. All of these statistics are taken into account and generate a national ranking on the Index of Multiple Deprivation, the numbers are lower for deprived areas. According to the Indices of Deprivation 2019ⁱ, only Coventry saw an improvement in its ranking (going from 59 to 81). Wolverhampton maintained its ranking at 19 whereas the other local authorities within the West Midlands region saw a decline. Birmingham is still listed as the most deprived area in the West Midlands, dropping 5 places to 6th; Sandwell is now 8th after previously being 12th. The report also shows that Dudley has become more deprived, now being ranked 104 compared to 2015s ranking of 111. Solihull remains the least deprived area within the West Midlands but has still fallen in terms of rankings, now being listed as 206th which is 4 spaces below its previous ranking of 210. Walsall has fallen the most in its listing, dropping 10 places to 31st. This shows that, not only is the West Midlands significantly deprived on a national level, the trend suggests it is becoming increasingly deprived. When the Indices of Deprivation are analysed further, it shows that 428 out of 1546 of the Lower Layer Super Output Areas (LSOAs) within the West Midlands are in the top 10% of the most deprived areas within England. People from lower socio-economic backgrounds, minority ethnic people and disabled people are significantly more likely to live in the most deprived areas within the region.

45.6% of households are located within the 20% most deprived areas in England. Average incomes in the West Midlands are 9% below the national average. Overall, the West Midlands Metropolitan area has a higher proportion of working age residents claiming out of work benefits compared to England and a higher percentage of working age residents who are economically inactive. The West Midlands Metropolitan area has smaller percentages of managers, professionals, small employers and self-employed workers. Conversely, it has higher percentages in the never worked and student categories, though there are differences by district.

Key transport inequalities

In the West Midlands, transport poverty is widely dispersed across the region but is more concentrated in urban peripheral areas. Transport accessibility is a key issue across numerous demographics.

Car ownership, transport dependence and mobility options

The percentage of car ownership within the West Midlands Metropolitan area positively correlates with the English Indices of Multiple Deprivation. Levels of deprivation impact the likelihood of being able to purchase a car. Solihull shows the highest percentage of car ownership. People on the lowest income centiles are much less likely to own a car and some of the most deprived wards have under 50% household car ownership. This is a stark difference compared to the 25% regional non-ownership levels. Groups much more likely to be reliant on public transport are: Single parents (primarily women); young and older people; black and minority ethnic people (minority ethnic people twice more likely to live in a household with no car ownership); people on low incomes; part-time workers; unemployed people (3/4 of jobseekers do not own a car); disabled people (only 38% of people with mobility difficulties are main drivers or have household access to a vehicle). The majority of bus and foot travel are made by individuals from the lowest income groups whereas train, metro and bicycle trips are mainly made by those who fall within the highest income groups. A significant percentage of West Midlands residents rely on public transport, primarily buses, to get around. White British people are more likely to live in a household with access to a car or van than any other ethnic group. Black people are more than twice as likely as white people to live in a household with no access to a car or van; there has been a marked drop in car ownership amongst young people. Even though car ownership can pose an advantage to many, 67% of car-owning households in the lower income groups report experiencing car related economic stress as running costs can be prohibitive. Car owners and main drivers in households are the least mobility constrained across all social groups. They make more trips over longer distance for all journey purposes giving them higher levels of access to activity, employment and other opportunities. Mobility and accessibility inequalities are highly correlated with social disadvantage. Lower income households travel much less and travel over much shorter distances than higher income household. They make nearly 20% fewer trips and travel 40% less distance

than the average household. People who depend more on bus for work tend to be lower paid, live in more deprived areas and are more likely to turn down jobs due to transport issues, than those on higher incomes, who tend to use cars and trains more often.

Location

Inequalities in the provision of transport services are strongly linked with where people live, and the associated differences in access to employment, healthcare, education, and local shops. People with more money have more options in both where to live and how to travel and good transport links drive up the cost of housing. The lack of private vehicles in low-income households (discussed above also with references to different protected characteristics), combined with limited public transport services in many peripheral social housing estates, considerably exacerbates the problem.

Commuting costs and transport affordability

Lower income households tend to spend a relatively high proportion of their income on commuting costs (25% compared to 13% for higher income households). Transport costs can even exceed wages for some on very low incomes, after tax and benefit withdrawal. Public transport costs has been reported to be the biggest issue faced by young people when accessing employment, education or training. Research has shown that there is a marked relationship between job accessibility by bus and employment outcomes. Issues with transport have been linked to low participation in post-16 education and college dropouts – which mostly impacts low-income households. One consequence of having no access to a car and poor transport links is an increased reliance on taxis, which tend to be more expensive per mile than other options. The poorest households take more taxi journeys than other income groups. Similarly, people relying on cash to buy daily tickets as and when required and not affording weekly/month/annual passes end up spending more on an annual basis in comparison to those who are more financially secure and can invest in a travel pass. A number of groups are especially affected as they are more likely to live in more deprived areas on lower incomes or be unemployed (Single parents, young and older people, black and minority ethnic, part-time workers, disabled people).

Network accessibility

Disabled people are more reliant on public transport in comparison to other groups, yet 1 in 5 disabled people within the West Midlands have reported having difficulty accessing the public transport network as a result of their condition. Barriers such as a lack of integration between different modes of transport, inaccessible infrastructure (buses/stations/shelters etc.), poor access to key services, service frequency, poor staff and passenger attitudes or/and awareness, safety concerns and inadequate, inaccessible and complicated information provision contribute to difficulties for disabled people when it comes to using public transport

Ring and Ride

For those who find it difficult or impossible to use conventional public transport because of a visible or hidden disability Ring and Ride is the main transport alternative. However, Ring and Ride is not a viable transport option for many disabled people who cite difficulties in using the service for a number of reasons: difficulty in booking journeys; difficulty securing return trips; the lack of a cross boundary service; the inability of Ring and Ride to take them to hospital appointments; punctuality of the service; not seen as an attractive option for many younger, disabled people. Ring and Ride patronage is continuing to fall while it is also becoming clear that DRT solutions are essential to help avert risks of social isolation and exclusion for those unable to use public transport

Perceptions of safety

Perceptions of safety is a key barrier when it comes to accessing public transport. Young, minority ethnic people, LGBTQ+, disabled people and women are more likely to feel unsafe using public transport. Young people in particular feel anxiety around public transport safety. LGBTQ+ groups and women feel vulnerable and fearful of crime when waiting at stations, shelters and interchanges. Within the West Midlands, disabled and young people are more likely to be concerned by the behaviour of other passengers, such as rowdiness, abusive behaviour, smoking and the consumption of alcohol as our surveys also indicate

For some, fear of discrimination can be a major hinderance for using public transport. For the West Midlands between March 2018 to February 2019, 191 hate crimes were reported. A campaign to make reporting of this easier was introduced in March 2019 resulting in a 27% increase with 243 hate crime events reported up until February 2020. This data includes hate crimes against all protected characteristics: race, religion, disability, gender identity and sexual orientation. This includes assaults on staff and is extracted from all WMP hate

crimes which contain the word 'bus' in the location, which means they could have taken place on board a bus or at a bus stop or station.

In the majority of crimes that occur across the bus network, the driver is the victim. Given the fact that the bus driver demographic is predominantly men from minority ethnic backgrounds, poor safety on buses will have a negative equality impact on such individuals.

Investment in bus services

As per the Marmot report (2020), nationally, the prioritisation of road and train travel over buses has widened inequalities in access to essential services, employment and social interactions. Between 2010 and 2017 funding for bus travel reduced by 45%. This has had disproportionate impact on all these groups who are primarily reliant on bus travel.

Poverty statistics

Since 2010 there have been increases in child poverty particularly in families with parents in work (37% of children in Birmingham live in poverty). Poverty rates have also increased for pensioners.

Minority ethnic communities experience higher rates of poverty (twice as high on average), child poverty and ill health and are more likely to be employed in hazardous, low-skilled work and live in poor housing conditions compared to their white British peers. For people of Black, Bangladeshi and Pakistani origin rates of poverty can be as high as 50%. In 2018/19 46% of minority ethnic children lived in families in poverty after housing costs, compared with 20% of children in White British families. Nearly half of those in poverty in the UK in 2018, 6.9 million people, were from families in which someone had a disability (Social Metrics Commissions, 2020). Since 2010, net expenditure per person in local authorities in the 10% most deprived areas fell by 31% compared to a 16% decrease in the least deprived areas (Marmot, 2020).

Digital inequalities

Digital skills are typically lower for those who are from deprived backgrounds. As society shifts more towards online systems and phasing out face-to-face interaction, those who do not possess sufficient skills or knowledge will struggle to adapt. As a result of this, the inequality gap will widen, with these individuals becoming more isolated. Just under 60% of individuals from lower income groups do not have access to the internet whereas 99% of individuals within higher income groups do.

3% of the population within the West Midlands do not have a bank account. These individuals rely solely on cash as a means of purchasing goods and accessing services, such as public transport. Interestingly, even though over 90% of adults own a debit card, the percentage of those who utilise online transactions is much less. Nationally, 7.5% of adults have never used the internet and within the West Midlands Metropolitan area, 13% of residents have never sent an online message or email.

95% of non-disabled adults were listed as recent internet users whereas this was only 78% for disabled adults. Contrastingly, this is not consistent with the internet usage of young disabled adults in the 16 to 24 demographic; 98% of disabled young adults were listed as recently using the internet which is close to the 99% of non-disabled young adults. This suggests that disabled people from older age groups are more disadvantaged when it comes to digital inequalities. Moreover, this is applicable to the overall older demographic, regardless of disability. Almost half of people aged 75 and over are not recent internet users. This may cause issues for the older population, with government forms and bill payments gradually moving online, these individuals may have great difficulty navigating the systems and subsequently paying their bills etc.

Nationally:

- 4.1 million adults living in social housing are offline
- 5.9 million adults have never used the internet
- 20% of disabled adults have never used the internet
- Adults aged 16 to 24 have the highest rates of internet use
- 67% of those not in paid work or full/part time education said they had never paid for public transport tickets online (compared to 52% in full time work; 53% in part time work and 60% in education).

Covid-19 and transport reliance

People facing the greatest deprivation experienced a higher risk of exposure to COVID-19 as they are more likely to live in densely populated, urban, polluted areas, in overcrowded households and work as key or shift workers. These people were more likely to have continued travel to work. Less than one in ten of the lower half of earners (who are also least likely to own a car) said they had the option to work from home during the lockdown, compared with half of the higher earners. Black and minority ethnic workers also make up a disproportionately large share of key workers and were thus also impacted. This also manifested in travel stats in the region which show that black and minority ethnic cardholders and people from lower income groups travelled more than white card holders with recovery of patronage by white cardholders being much slower compared to other ethnic groups.

The pandemic also had an impact on people's finances and employment status. Those on low wages were seven times as likely as high earners to have worked in a sector that has been shut down. Those aged 25 and younger are more than twice likely to work in a sector that has been forced to close. Women were about one third more likely than men to work in a sector that has been shut down as a lot of women work in retail and hospitality. Preliminary research also indicates that the number of adults who were food insecure significantly increased after the lockdown. At risk vulnerable disabled people have also had to shield because of health conditions which may have resulted in a drop in income if they cannot work from home. Disabled people and older people may have had a range of concerns during the lockdown including access to care and medication, increased social isolation, potential loss of carer support and the possibility of increased costs for food as they may have had to shop locally in more expensive shops or may have had to travel by taxis as public transport is reduced. During the lockdown, bus travel and generally public transport was significantly reduced which would have had a significant impact on key workers and those reliant on public transport to get around. Those relying on public transport would have also been at higher risk of contracting COVID-19. In the longer term a reduction in bus demand may result in a reduction in service frequency or service quality which is likely to negatively impact these groups

Environmental inequalities

Road traffic is the primary source of nitrogen dioxide (NO_x) emissions nationally and regionally and buses are major contributors. Air pollution causes the equivalent of 40,000 early deaths every year. Some groups of people are more likely to be negatively impacted.

Environmental inequalities occur where specific communities experience a poorer environmental quality. Young children, young adults, minority ethnic people and households in poverty have the highest levels of exposure to air pollution because they are more likely to live in urban, densely populated areas with higher pollution sources. Socially and economically disadvantaged people and some ethnic minority groups may also experience increased susceptibility to the negative air pollution-related health effects, ranging from conditions such as respiratory irritation and cardiovascular disease to premature death, as a result of higher underlying baseline disease rates in deprived communities.

Children and older people are also more susceptible to certain health impacts. An example of this susceptibility is the higher rates of asthma in children, the symptoms of which can be exacerbated by poor air quality. Higher exposure to air pollutants increases the risk of lung cancer, respiratory infections, stroke, ischemic heart disease, chronic obstructive pulmonary disease and depression.

The severe impact of Covid-19 on people from minority ethnic groups has been linked to air pollution and overcrowded and poor-standard homes by a study of 400 hospital patients.

Cycling and walking inequalities

Between 2010 and 2018 there was a 5% increase in walking trips per year for adults for those on the lowest income and 14% for those on the highest income. Cycling is primarily popular with white, under 40, males with medium to high household income. Women, minority ethnic groups, disabled people, older people and people from deprived neighbourhoods are significantly under-represented in cycling.

4. Is the policy likely to have a positive or negative impact on any equality target groups? Please elaborate (Is it likely to affect some groups differently in either a positive or negative way? What elements of the policy will have a differential impact?)

When it comes to our current bus offer, there have been clearly identified accessibility and inclusion barriers across the different protected characteristics, highlighted in question 3.

There is typically a high reliance on bus and public transport for more vulnerable groups. Buses provide everyday mobility, and support reducing social exclusion by connecting people to jobs, work, education, shopping and social activities – such as seeing friends and family. They are particularly important and a vital lifeline for those who lack access to a private car. Groups much more likely to be reliant on public transport due to lack of access to a private car and higher deprivation levels are: Single parents (primarily women); young and older people; black and minority ethnic people (minority ethnic people twice more likely to live in a household with no car ownership); people on low incomes; people living in deprived areas; part-time workers; unemployed people (3/4 of jobseekers do not own a car); disabled people (only 38% of people with mobility difficulties are main drivers or have household access to a vehicle). While around 25% of West Midlands residents do not have access to a car, the figures tend to be higher for these groups. Given the higher-than-average deprivation areas in the region and the diverse population demographics (a younger than average population and higher percentages of minority ethnic residents) an effective bus transport system is imperative in the region.

The majority of bus and foot travel are made by individuals from the lowest income groups whereas train, metro and bicycle trips are mainly made by those who fall within the highest income groups. Due to reliance on bus travel, the aforementioned groups are more likely to benefit from an improved bus network but are also most likely to be negatively impacted by bus related challenges.

Key challenges of the bus network are outlined in more detail below:

Challenges	Details of issues	Equality Impact
Ticketing complexity and travel affordability	<p>Difficult for passengers to travel between bus operators and modes for the lowest capped fare. Not easy to make complex, multi-leg trips by the bus network at affordable rates</p> <p>Both rail and bus fares have risen at a higher rate compared to the median household disposable income. On the other hand, motoring costs have remained relatively level with the median household disposable income and in stark contrast to public transport costs, the general cost of purchasing a vehicle has declined.</p>	<p>Whilst bus operators across the West Midlands have reduced their fares in response to the pandemic, there is a risk that fees will increase significantly once bus patronage has reached pre-pandemic level.</p> <p>Those from lower socioeconomic backgrounds and young people may find it difficult to afford bus fare, which can restrict their opportunities for employment, education, skills and leisure.</p>

	<p>There is a risk that Covid-19 and changing travel patterns may result in increase in fares to overcome to financial impact the pandemic has had on operators.</p> <p>More complicated routes are especially costly as is faster travel (using bus as part of a multi-modal journey with rail and Metro)</p>	<p>Similarly, job seekers may struggle to afford the necessary transport costs to attend job interviews, subsequently relying on the local job market, which may be more saturated and consist of lower-level jobs which will therefore pay a lower wage.</p> <p>The complexity around ticketing, and moving away from cash as a means of purchasing, risks segregating individuals with lower levels of income from accessing the network at all, these individuals also tend to heavily rely on public transport to travel and access opportunities.</p>
<p>A network that has wide coverage, is fast, integrated, reliable with frequent services, offers good connectivity and ease of use</p>	<p>Increased journey times which make it more difficult for people to access employment, education and other opportunities at longer distances</p> <p>Reliability of the network is lower than levels seen in high bus use cities with fewer buses arriving on time or near time</p> <p>Over time, changes in land use and the segregation of services have led to journeys being more dispersed making a number of destinations not as easily accessible by public transport</p> <p>For a number of developments, public transport accessibility and connectivity/integration is not planned well or funded for</p>	<p>Many opportunities to develop skills and access employment will be restricted. Those from lower socioeconomic backgrounds, who tend to rely more on public transport modes, may not be able to justify the longer commute time (and potentially increased cost). This can have a greater impact on jobs and skills prospects, making them more likely to stick to jobs within a close proximity – which may be lower skilled and pay less. Similarly, this can saturate the local jobs market, making it less likely to secure employment which can have a confounding impact on the</p>

	<p>The network does not always serve struggling centres in a way to help them recover, or help new, developing centres grow inclusively and sustainably</p> <p>Longer term trends indicate that the journeys we make will be longer and therefore less viable by the current bus service offering, resulting in people carrying out these longer journeys by car or/and not being able to make these journeys at all</p>	<p>unemployment rates and local economy.</p> <p>Whilst concessionary pass holders receive free travel on public transport within the West Midlands (across all modes), they may be discouraged from using public transport due to poor connectivity. For example, if the closest bus stop is a 10 minute walk away, disabled and elderly customers may struggle to fulfil this part of their journey, potentially aggravating existing health conditions. Making them more reliant on cars/taxis which can come as a greater cost in the longer term.</p> <p>Longer bus journeys will have a disproportionate impact on those who rely heavily on the network, whether it is to access school, employment, appointments or for childcare purposes. This will be predominantly young people, those from lower socioeconomic backgrounds, minority ethnic communities, disabled and older people as well as single parents and job seekers.</p>
<p>Perception of safety and anti-social behaviour as well as wider customer satisfaction</p>	<p>Lower levels of customer satisfaction compared to other comparable regions</p> <p>Customer satisfaction with personal safety is lower than levels achieved</p>	<p>Safety is a key concern for women, young people, older age groups, minority ethnic communities, LGBTQ+ people and disabled people when it</p>

	<p>in high bus use areas. While crime levels are low and the region is one of the safest public transport wise, perceptions of safety do not reflect the crime figures and based on customer feedback may have an impact on choosing bus as the preferred mode of transport</p> <p>Negative perceptions of bus travel, and vehicle standards, and of level of customer care by drivers.</p>	<p>comes to accessing public transport.</p> <p>Whilst the BSIP workstreams seek to make the bus network more inclusive, if perceptions of safety isn't addressed then the network is still arguably inaccessible for these protected groups.</p> <p>Instances of crime across the bus network are predominantly against bus drivers themselves, who are overrepresented by minority ethnic males.</p>
<p>Information availability and accessibility</p>	<p>The network can be confusing in terms of service numbers, route planning, information provision</p> <p>The network is not always consistently or well-presented and does not have a well-understood hierarchy of service types with core routes easy to distinguish.</p> <p>Information is not always easily accessible to all passengers (in terms of channels employed, or not inclusive in terms of individual needs), or is confusing</p>	<p>A lot of the information around public transport is predominantly shared through online platforms, such as social media and websites. Such methods are inaccessible to those who don't have internet access or an appropriate device which is necessary to access such information, such as people from low socioeconomic backgrounds.</p> <p>Similarly, disabled people and those within older age groups may have difficulty accessing this information due to lack of sufficient digital skills.</p> <p>Accessibility of information poses as a big barrier to transport for disabled customers and those from minority ethnic communities where English isn't a main</p>

		language. Information that isn't presented to suitable accessibility standards can prevent these users from accessing public transport altogether.
Accessible transport services	Continued reduced Ring and Ride patronage and a service that does not necessarily meet the needs of a wider range of disabled residents	<p>For many disabled customers, the commercial bus network is inaccessible, making them more reliant on Demand Responsive Transport. However, if the service fails to meet the needs of its customers, it risks segregating these individuals altogether.</p> <p>In addition, this can increase reliance on taxi hire which can be a substantial cost, particularly when there is a need to make frequent visits to appointments/ shops etc.</p>
Design accessibility and inclusivity	While there have been improvements in transport and design accessibility there are still gaps which is reflected in customer satisfaction levels of people with physical and hidden disabilities	<p>Key affected groups are older people and disabled people – both visible and hidden disabilities</p> <p>Disabled customers can experience difficulty when accessing the bus network due to infrastructure and vehicle design.</p>
Declining bus demand, funding reductions to the Levy with potential impact on current provisions e.g., complementary concessions, subsidised bus	<p>Low bus mode share in the region (8%) compared to comparable urban areas</p> <p>20% decline in passenger journeys over a 10-year period. Moreover, due to Covid-19, sharp decline in bus demand with only partial recovery. (up to 65%). Reduced</p>	Any impact on funding for concessionary passes will have a significant impact on concessionary pass holders, who are predominantly disabled and elderly who also rely heavily on the transport network. Funding constraints may also mean

<p>services, information provision and accessible transport services</p>	<p>patronage result in reduced revenue and combined with increases in bus operating costs, a potential medium to longer-term decline in service provision (a smaller bus network or more infrequent services) and poses a challenge to the assisted travel revenue budget/discretionary funding (due to an increase in public sector funding needs to cover gaps)</p> <p>New covid-19 related ways of working and changes in travel patterns may continue to have an impact on bus travel demand longer-term</p> <p>Continued funding reductions to the Transport Levy which is reflected in decisions regarding assistive travel policies and the subsidised network</p> <p>The cost of operating subsidised bus services in 2019/20 has increased to £9.4 million from £8.5 million in 2018/19. Due to the pandemic, costs have further increased to £11.5m in 2021/2</p> <p>With many trips more than 4 miles, there is need for better integration with other modes of transport as many longer trips are too long</p> <p>Currently the network does not sufficiently support access to night-time shift work on peripheral business parks and there are some gaps in geographic coverage of the turn up and go core network</p> <p>Evening frequencies are low</p>	<p>that a number of other groups from lower socio-economic backgrounds who are heavily reliant on public transport to get around (e.g. young people) are likely to disbenefit.</p> <p>Accessible transport services, such as Ring and Ride, are a necessity for some protected groups, in some cases being the only appropriate method of public transport for them. Any cuts in such services risks segregating those who are most vulnerable in our society, risking their independence. In addition, should this provision be removed, service users will be more likely to rely on taxis and private car hire which will be a substantial cost over the longer term.</p> <p>Subsidised bus services are in operation because there has been a clearly identified, social need for them, for example they provide access to healthcare and local amenities. Predominantly located across poorly connected areas anyway (which also correlated with deprivation), the removal of such services means these social needs would no longer be met. Generally, the most impacted from such</p>
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	<p>The number of commercial bus service kilometres decreased by 1.5% in 2019/20 while the number of subsidised bus service kilometres decreased by 5.7%</p> <p>Car mileage has vastly increased across the West Midlands and we now have one of the highest regions of car ownership in England. This has put increasing pressures on public transport services, including bus, which are needing to compete with the rising popularity of the car being the favoured choice of travel.</p> <p>A reduction in active travel and increased car use is likely to result in decreased bus travel (loss of active bus travel stages)</p>	<p>changes will be from vulnerable groups, such as those from lower socioeconomic backgrounds, minority ethnic communities and disabled customers.</p>
Increased congestion	Increased congestion slows buses (bus speeds have been falling by 1% annually) and restricts access to opportunities by extending journey travel times	Facing longer journey times will impact all customer demographics. However, more vulnerable groups, who typically have a greater reliance on bus travel, will be the most impacted by this as a result. These groups are predominantly young people, minority ethnic communities, those from lower socioeconomic backgrounds, disabled people and elderly customers.
Environmental challenge	A very ambitious aspiration of transitioning to net-zero carbon emissions by 2041 but a number of vehicles are not environmentally friendly while modal shift to the car and increased congestion is hindering such aspirations	<p>An increase in car usage will have a significant impact on air pollution levels during high congestion areas, which are typically more deprived. As a result, health inequalities linked to high air pollution are likely to occur amongst groups that</p>

		typically populate these areas (generally people from lower socioeconomic background and minority ethnic communities).
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One of the key priorities of the BSIP is to mitigate and overcome these challenges to ensure bus is accessible for all and integrates all modes of public transport within the region. By addressing the inaccessibility within our current bus offer, it will help place bus as a realistic alternative to car travel.

BSIP Workstream	BSIP Principles	Equality Impact
Services and Network	<ul style="list-style-type: none"> • Intensive services and investment on key corridors, with routes that are easier to understand • Service patterns will be integrated with other modes • More demand responsive services and ‘socially necessary’ transport 	<p>There is an emphasis within the BSIP around enhancing the offer of our subsidized bus services and supporting local networks. Having a sufficient local network will ensure socially necessary transport continues, meaning the needs of residents will continue to be met. In addition, by further developing this network, it opens up the potential for greater benefits to residents, on top of meeting their socially necessary needs. For example, making sure the local network successfully feeds into the greater core network, will open up more opportunities for leisure, employment, education and others, therefore mitigating existing barriers</p> <p>Easier to understand routes will alleviate the anxieties customers may have around accessing the network and utilising other modes. Such as customers who don't have English as a main language, disabled customers as well as elderly customers.</p>
Fares and Ticketing	<ul style="list-style-type: none"> • Lower and simpler fares 	<p>Lower fares will ensure bus is affordable for those with lower levels of disposable income, opening up the prospect of travelling further for opportunities.</p>

		<p>Alleviating the complexity of the current ticketing offer makes it more likely that customers will be able to select the ticket option that offers the most value to them, subsequently saving money.</p> <p>By addressing seamless ticketing across operators and modes, it can help alleviate the barriers customers may face when using different modes of public transport. This is an identified accessibility barrier when it comes to the different equality groups, a confusing process discourages them from applying a multi-modal approach to public transport. The proposed ticketing reform will increase the likelihood of passengers taking advantage of the public transport network, saving money in the longer term as well as opening up more areas for opportunities.</p>
<p>Bus Priority</p>	<ul style="list-style-type: none"> • There will be significant increases in bus priority 	<p>Increasing bus priority will have a confounding impact on journey times, improving the potential for bus to become a suitable alternative to car/ taxi travel. This can have a positive impact on groups previously mentioned that are restricted by poor journey lengths.</p> <p>Moreover, prioritizing bus will also help reduce congestion across the network, as more people see the potential to switch to using public transport, it'll also support the journeys of those who need a car, such as disabled people with adapted cars. This will also have a subsequent impact on air quality and pollution across traditionally highly congested areas, which can</p>

		help improve health equalities across these localities.
Information, Assets and Brand	<ul style="list-style-type: none"> The local bus network is better presented as a single system that works together, with clear passenger information 	<p>A streamlined approach to branding and information will help support the understanding of the network across the different modes of travel, making it easier for passengers to navigate overall whilst also greatly benefitting more vulnerable groups, such as customers with learning disabilities and those who don't have English as a main language.</p> <p>An improvement in passenger information will have a positive impact on the customer base overall, but will have a particularly positive impact on more vulnerable groups. Features such as 'Next fastest journey to' can help increase the confidence of passengers when it comes to accessing the network.</p> <p>Enhanced Real Time Information (RTI) with the feature to update with immediate disruption/ travel changes ensures customers are kept up to date. This can help customers when it comes to journey planning ahead of time, whilst also ensuring customers are made aware as quickly as possible of any immediate changes, for example a disabled customer could adapt their route to accommodate the disruptions whether planned or not.</p>
Buses and Decarbonisation	<ul style="list-style-type: none"> Modern buses and decarbonisation 	Introducing more environmentally friendly buses will have a confounding positive impact on vulnerable groups. Areas with high levels of air pollution typically correlate with higher levels of

		<p>deprivation, which in itself correlates with poor health inequalities.</p> <p>The modern buses will include an additional space for wheelchair users and more clear signage around priority seating. These enhancements are likely to alleviate some anxieties of customers and encourage them to access the network.</p> <p>However, it is worth noting that there are some concerns amongst disabled customers around the inaudibility of such buses, so audio alerts for such buses are a key requirement.</p>
Customer Excellence	<ul style="list-style-type: none"> • Give bus passengers more of a voice and a say 	<p>The development of a customer charter will ensure TfWM holds itself to account, outlining to customers our objectives and principles.</p> <p>By empowering customers to provide their feedback, issues can be identified, which may have a negative equality impact, and can be dealt with accordingly. This can also serve as a way of mitigating any potential negative equality impact in future.</p>
Safer Travel		<p>Addressing concerns around driver safety and training will have a confounding impact on perceptions of safety across the network, if drivers feel safe and supported, they will feel more confident to address any poor behaviour they come across, which will subsequently enhance the passenger perceptions of safety.</p> <p>By applying a targeted approach to the different equality groups, it</p>

		<p>ensures the identified approaches are fit-for-purpose as they will be tailored to their respective audiences. The impact of this may improve customer confidence in the security measures that are in place, enabling them to feel they are safe when accessing the network. As a result, it may encourage an increase in bus patronage across these groups.</p> <p>Enhancing CCTV measures and the visibility of capable guardians can help alleviate any fears and worries customers may have around safety, particularly if they are from groups more vulnerable to crime.</p> <p>Improving the information available on safety measures, such as how to report instances, can encourage more people to come forward. This will help provide a more accurate picture of crime across the bus network. The more refined data will enable us to determine whether there is a disproportionate probability amongst certain demographics of being victims of crime. Such data will allow more fit-for-purpose solutions to be developed and implemented, helping enhance the perceptions of safety across the network overall.</p>
<p>Longer term transformation</p>	<ul style="list-style-type: none"> • Longer-term transformation of the network through Bus Rapid Transit and other measures 	<p>Likely to have positive impact on a number of groups by offering an integrated travel experience and by enhancing travel options. Innovative solutions (e.g., mobility credits) are also looking to address key concerns/barriers identified in previous sections and are likely to positively impact on different</p>

		protected characteristics (provided they have embedded equality considerations at design stage)
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5. Have you consulted interested parties (including representatives from the equality target groups) who will/may be affected by the policy? What were the outcomes of the consultation? If you haven't conducted consultation, is there need for consultation and who are you planning to consult?

. Throughout the development of the BSIP, the respective workstreams worked closely with the WMCA Equalities team to ensure any potential equality impact was taken into account, with revisions implemented where necessary in order to mitigate any identified issues. In developing the BSIP we have reviewed a number of previous surveys, consultation and engagement activities. The BSIP will form the basis of a new EP Plan that will be consulted on in November. Individual projects and initiatives (e.g., bus priority etc.) forming part of the EP plan will undergo equality impact assessments at planning/design stage or/and engagement with the public and equality groups (where relevant)

6. Is further research needed (i.e. consultations, working groups, surveys, data) to properly assess impact on the different equality target groups? If yes, how will it be undertaken and by when?

Public consultation will be required post-publication of the BSIP and at EP plan stage (in November)..

7. What measures does, or could, the policy or strategy include to help promote inclusion and equality of opportunity for and/or foster good relations between people from different equality groups?

As a standard, the BSIP and its respectiver workstreams have been developed with the core aim of improving the bus network across the West Midlands. A key focus has been on improving the accessibility of bus as a mode of transport, whilst also enhancing the accessibility of other modes. However, in order for the BSIP and ensuing EP plan to be as accessible and successful as possible, some considerations needs to be taken into account:

- Reviewing the role of Ring and Ride, Community transport etc. to ensure that they can provide a more flexible solution for social necessary supporting services can help meet customer evolving needs, However, it is also important to continue to consider accessibility needs of customers who are unable to use conventional public transport and may still require a door-to-door service to fixed destinations. That element of the service would needs to be embedded within new solutions. .
- Key in delivering services that help support diverse customer needs is continued engagement with the customers (e.g., ring and ride users) and their involvement in the co-design of services. It is important to scope out what elements of the plan would require customer input and engagement ensuring it is meaningful and outcome focused Mode integration will need to take into account the accessibility needs of disabled customers at planning/design stage – it needs to be integrated and considered from the outset
- Cash-based purchasing is still the main method of ticketing for many from lower socioeconomic backgrounds. Whilst there is likely to be an emphasis on contactless purchasing/as a means of topping up your account, it's important that it's still successfully communicated that tickets can be purchased through cash and that these options remain available and do no financially disbenefit those who are
- While a consistent branding can help provide clarity and support integration, it is also vitally important that accessibility requirements (e.g. in relation to fonts, colour contrast) is not compromised. Testing of proposals with key access groups can also help support this
- Passenger information needs to meet diverse customer needs – the trend to online provision and reduction in face-to-face customer provision is likely to negatively impact a number of protected characteristics. Therefore, enhancements in information provision will need to consider mitigation for any negative impact from the shift to online provision
- Customer satisfaction needs to be monitored by broader segmentation, such as disabled customers, minority ethnic customers etc.
- Infrastructure and vehicle design considerations to be embedded within existing proposals

8. Do you think that the policy in the way it is planned and delivered will have a negative, positive or no impact on any of the equality target groups (please tick as appropriate)?

Positive impact: where the impact on a particular group of people is more positive than for other groups

Negative impact: where the impact on a particular group of people is more negative than for other groups

Neutral impact: neither a positive nor a negative impact on any group or groups of people, compared to others.

EQUALITY TARGET GROUP	AGE	GENDER (including gender reassignment)	DISABILITY	MATERNITY	RACE	RELIGION/BELIEF	SEXUAL ORIENTATION	SOCIO-ECONOMIC
POSITIVE IMPACT	X	X	X	X	X			X
NEGATIVE IMPACT								
NEUTRAL IMPACT						X	X	

9. If adverse/negative impact is noted to any of the listed equality target groups, can it be justified, i.e. on the grounds of promoting equality of opportunity for any other group/s?

The Bus Service improvement plan is likely to have positive equality impact on a number of protected characteristics as it has taken into account existing barriers and has highlighted areas that could help address such barriers. A number of additional considerations have also been included in question 7

10. ACTION PLAN

What practical actions can be taken to promote inclusion and reduce/remove any adverse/negative impact?

Issues to be addressed	Actions required	Responsible officer	Timescales	How would you measure impact/outcomes in practice
Feasibility of implementing proposed suggestions in question 7.	Workstreams to be reviewed and amended where possible	Respective BSIP workstream leads	When in-depth project planning commences	Any changes will be identified within the more refined project documents for each workstream

ⁱ <http://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>