

## Equality, Fairness and Rights Impact Assessment (EFRIA)

The Equality, Fairness and Rights Impact Assessment (EFRIA) is one of our specific duties to [assess the impact](#) of applying a new or revised policy or practice against the needs of the General Equality Duty. This means East Renfrewshire Council must be mindful when assessing impact against these needs to:

- ensure the policy does not discriminate unlawfully
- consider how the policy might better advance equality of opportunity
- consider whether the policy will affect good relations between different groups

The Fairer Scotland Duty places a legal responsibility on particular public bodies in Scotland to actively consider ('pay due regard' to) how they can reduce inequalities of outcome caused by socioeconomic disadvantage, when making strategic decisions. The UN Convention of the Rights of the Child (UNCRC) is an international human rights treaty which sets out the rights every child has. The Scottish Government is currently seeking to incorporate the UNCRC into Scot's law

The Equality, Fairness and Rights Impact assessment considers how a policy\* could impact on the needs of individuals protected by the [Public Sector Equality Duty](#), [the Fairer Scotland Duty](#) and the [UN Convention of the Rights of the Child](#).

<b>Name of policy*:</b>	Home to School Transport Policy
<b>Description of policy:</b>	This policy codifies the existing school transport provision in place for pupils in East Renfrewshire. At present, there is a very limited policy in place and this new policy brings clarity and greater consistency to the provision of transport. The policy maintains existing mainstream transport provision and introduces a small number of minor changes to ASN provision to improve the experience for young people and bring it in to line with Scottish Government national guidance.
<b>Why is the policy required?</b>	There is no clear policy in place for the provision of transport. The new policy provides a clear, consistent approach for provision, providing more information for staff, pupils and parents on the circumstances under which transport will be provided.
<b>Date EFIRA completed:</b>	5/6/23
<b>Completed by:</b>	Graeme Hay
<b>Lead officer for policy:</b>	Graeme Hay/Lynda Kiernan
<b>Department:</b>	Education Department

\*The term 'policy' covers any work or function of East Renfrewshire Council i.e. customer and service delivery, staffing, criteria, practices, proposals, activities and decision-making

## Guidance – please read

### Section 1

This section enables you to determine if a full assessment is required. If a full assessment is not required, this must be clearly stated in **Section 9** of the form.

Section **2-8** is the full assessment covering the sections listed below:

<b>2</b>	<b>Engagement and Consultation</b> Give details of how different groups have been consulted about the policy.
<b>3</b>	<b>Impact on individuals or groups with protected characteristics</b> How will the policy impact individuals or groups who fall under one of the nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation?
<b>4</b>	<b>Impact on socio-economic disadvantage</b> How will the policy impact individuals or groups disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications?
<b>5</b>	<b>Impact on Children and Young People</b> How will the policy impact on the rights and needs of children and young people?
<b>6</b>	<b>Contractors and suppliers</b> Will the policy be delivered by any contractors or suppliers in full or partially?
<b>7</b>	<b>Outcome of assessment and action plan</b> What is your decision based on the assessment and are there any mitigations or actions that need to be addressed?
<b>8</b>	<b>Approval</b> Details of when and who approved the policy.

When completing the assessment you must consider relevant evidence, including information received from equality groups. This evidence should inform the result of your impact assessment. You're required to take action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and enhancing any potential for positive impact. If any adverse impact could result in unlawful discrimination, the policy must be fully reviewed and amended.

**All impact assessments will be published on the Council website**

**1. Screening**

**This section should be completed to establish if a full assessment is required.**

<b>1.1 What is the nature of the work or activity?</b>	
Select a category from below that explains the work or activity you are doing.	
<input checked="" type="checkbox"/> Policy or Strategy <input type="checkbox"/> Programme or Plan <input type="checkbox"/> Project delivery <input type="checkbox"/> Service or Function <input type="checkbox"/> Budget proposal <input type="checkbox"/> Other please state: <a href="#">Click or tap here to enter text.</a>	<b>Is this work or activity?</b>  <input type="checkbox"/> New <input checked="" type="checkbox"/> Change or review of existing <input type="checkbox"/> Other- Please state: <a href="#">Click or tap here to enter text.</a>
<b>1.2 What will happen as a result of this policy?</b>	
What changes will come about for individuals and groups through this policy?- Select all that apply	
<input type="checkbox"/> Change to Council, Trust or HSCP charging arrangements (including introduction, removal, increase or decrease) <input checked="" type="checkbox"/> Change to how a service is delivered (including addition, change or removal of practices/procedures/processes) <input type="checkbox"/> Change to provision of services or staffing <input type="checkbox"/> Change to entitlement or eligibility for service delivery or welfare/benefit access <input type="checkbox"/> Other. Please state: <a href="#">Click or tap here to enter text.</a>	

**1.3 Is there any indication or evidence the policy will discriminate unlawfully; affect equality of opportunity for different groups or affect good relations between different groups?**

Will any individuals be treated less fairly than others if this policy is implemented? This includes employees, residents, community groups and visitors to the area.

- Yes
- No
- Don't Know

**1.4 What groups of individuals are likely to be impacted by this policy?**

Select which groups of individuals are likely to be impacted positively or negatively if this policy is implemented.

- The policy has potential to impact **individuals with protected characteristics\***
- The policy has potential to impact **socioeconomic disadvantage\*\* for individuals**
- The policy has potential to impact **children and young people up to the age of 18**
- The policy has no impact on individuals

\***Protected Characteristics** are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

\*\***Socio-economic disadvantage** is where an individual is disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications

**1.5 What individuals will be affected?**

Tick all that apply

- East Renfrewshire Council employees
- Organisations or individuals carrying out a service on behalf of the Council
- Voluntary sector groups/organisations
- People living in a specific area of East Renfrewshire. Please state: [Click or tap here to enter text.](#)
- Everyone living in East Renfrewshire
- People working, studying or volunteering in East Renfrewshire

- Visitors to East Renfrewshire
- A group of people with a shared interest:
- Experiencing socioeconomic disadvantage (this includes low/no wealth, low income, area deprivation or material deprivation)
- Being in a particular age category
- Being from a black or minority ethnic group e.g. Gypsy/Travellers
- Speaking a language other than English
- Women/girls
- Identifying as Lesbian, Gay Bisexual or Transgender
- Belonging to a particular religion or belief
- Pregnant women or those on maternity/paternity leave
- Having a long term limiting health condition or disability
- Providing unpaid care for others
- Another group e.g. those experiencing homelessness, offenders/ex-offenders. Please detail: [Click or tap here to enter text.](#)
- x Children and young people living in East Renfrewshire
- x Children and young people using East Renfrewshire Council services
- Children and young people visiting East Renfrewshire
- None of the above

**Review your answers above.**

- If the policy has **no impact on individuals**, and you have selected 'no' to section 1.3, an impact assessment is not required. **GO TO SECTION 9**
- If the policy will have an impact on individuals and/or you have selected 'yes or don't know' to section 1.3, complete the full assessment. **GO TO SECTION 2**

## 2. Engagement and Consultation

**This section will assess how the policy is being communicated to certain groups and how you have consulted them.**

### **2.1 How have individuals (incl. children & young people) who might be affected by the policy been consulted or involved?**

This can include a summary of findings from recent consultations, surveys, user research or customer testing that has been carried out. Include dates and information.

Following the consideration of the draft Home to School Transport policy by Education Committee in April 2023, the department undertook a non-statutory consultation exercise to ensure the views of stakeholders were considered. Such a consultation is not required, however, it was recognised that this would be a valuable exercise in developing the final version of the policy. This primarily involved an online survey but also included feedback being sought from pupils attending the Williamwood High School Support Service and from individual Parent Councils via the Parent Council Chairs Forum.

A total of 136 responses were received to the online consultation, with almost all being received from parents/carers. Almost half (46%) of responses were received from those who currently accessed school transport. Responses were received from families with pupils at a number of different schools with the most responses received from Isobel Mair School, Maidenhill Primary School, Carlibar Primary School, Mearns Castle High School and OLM Primary School.

In addition to being asked their views on the principles which informed the policy, respondents were also given the opportunity to raise any other issues related to transport across various sections of the policy. A wide range of views were expressed through the policy and these are summarised in the follow up report being considered by Education Committee in June 2023.

### **2.2 How will you communicate information about this policy to individuals who have: hearing and/or sight loss; English as an additional language; are digitally excluded; have literacy/numeracy barriers?**

Think about how you will communicate information about the policy to the above individuals. This may include printed materials being accessible in other formats, e.g. Braille, easy to read, translated in other languages

In addition to the detailed policy document, it is intended to work with the Council's communications team to prepare an easy-read version of the policy. The policy itself is a fairly lengthy document given the complexity of provision, so it is intended this version will provide a helpful summary on eligibility and access.

### 3. Impact on groups with protected characteristics

**This section will assess if the policy has potential to impact individuals with protected characteristics. You should consider any evidence or information you have on how it will affect different groups of individuals, both positively and negatively.**

Below is a suggested list of sources:

- Input from local Councillors
- Findings from engagement exercise and consultations.
- Information or feedback from groups of individuals, such as equality interest organisations or groups who speak on behalf of others
- National, regional or local statistics
- Analysis of enquiries or complaints from customers
- Recommendations from inspections or audits
- National or regional research to identify similar issues
- Comparisons with similar policies in other departments or authorities to identify similar issues

**You may want to consider collecting new evidence that you don't have but think will be relevant.** For example: setting up meetings or focus groups, carrying out user research.



### 3.1 Are there known inequalities within the policy?

For example: barriers to transport for some groups; opening hours and location, organisational pay, terms or conditions; how public information is provided?

Yes. The policy concerns all school transport, however the changes to the policy affect provision for children and young people with additional support needs.

The key intention in developing this policy is to provide greater clarity to staff, parents and pupils on the provision of school transport. In almost all cases, the policy builds on the existing, well-established provision already in place within East Renfrewshire and there is very little change in this regard.

The policy provides greater alignment between mainstream and ASN transport provision by moving to a presumption of 'collection points' for all transport provision. This is a change from the existing practice whereby all ASN provision is made available from a pupil's individual home address.

Whilst this does not create any additional inequality, there is the potential that it could be perceived as negatively impacting on those pupils who access ASN provision. Conversely, the policy is intended as a means to improve the experience for the young people accessing ASN transport by reducing the time spent on a vehicle at the beginning and end of the day.

### 3.2 Use the table below to consider how the policy may impact on a particular group with protected characteristics through reviewing the evidence, experience and needs of this group

Characteristics/circumstances	Evidence, experience and needs- outline any data or research that shows how this group may be impacted (include sources)	Will the impact on this group be positive, neutral or negative and why?
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Age	School transport is provided for primary and secondary aged pupils attending a school within East Renfrewshire. A small number of pupils are provided with transport for accessing services outwith East Renfrewshire where it cannot be provided within the authority.	Neutral There is no change to the existing eligibility for pupils accessing school transport.
Disability or long term health condition	A total of 263 pupils with additional support needs currently access specialist transport on a regular basis. The specific pattern of use can vary depending on the specific attendance patterns of the pupil.	Neutral Pupils will continue to be able to access school transport in line with their needs.
Race	N/A	
Sex	N/A	
Gender reassignment	N/A	
Marriage/Civil Partnership (only applicable to Council employment policy)	N/A	
Pregnancy / Maternity	N/A	
Religion / Belief	N/A	
Sexual orientation	N/A	
Providing unpaid care	Young carers may have additional responsibilities for supporting siblings with additional support needs to reach their pickup.	Negative There is the potential for young carers to experience additional barriers in

		accessing education as a result of the pickup point being further from home.
Any other relevant groups e.g. unemployed people, people experiencing homelessness, care leavers, people involved in the criminal justice system, people with literacy/numeracy barriers, people living in rural communities.	Rural areas School transport is particularly important for those living in rural areas or those areas not well served by alternative means of transport.	Neutral There is no change to existing provision in place.

### 3.3 In what ways, if any, would this policy help to eliminate discrimination or undermine it?

Discrimination means treating individuals differently from others. For example, not recruiting someone as they are deemed too old/young; or a support group running on an upper floor with no lift access will discriminate against people with mobility issues or wheelchair users

The policy has a near neutral impact on discrimination.

The principles set out at the beginning of the policy make specific reference to meeting the needs of pupils. This makes clear that transport will be provided on the basis that it meets the particular needs of individual pupils, ensuring that they can travel to and from school safely.

The policy brings greater alignment to both mainstream and ASN transport. This is line with the Scottish Government's national guidance which emphasises the need for ASN transport in particular to help support young people to become more independent. Where the needs of a child or young person require specific support in place to travel to and from school, this is provided based on the assessed need. The policy details the process by which transport provision is made available. This will ensure that pupils do not experience any discrimination when accessing school via transport.

### 3.4 In what ways, if any, would this policy advance or undermine equality of opportunity?

This is when individuals from different backgrounds are treated fairly through providing an equal footing or level playfield to achieve outcomes. For example, children who have additional support needs are provided with teaching support to fully participate in the school curriculum or a deaf BSL user is provided with a BSL interpreter at health appointments.

The policy does not undermine equality of opportunity.

All school transport is provided in line with legislative requirements. The policy sets out very clear eligibility criteria for pupils to access school transport. These criteria are based on the statutory requirements set out in legislation (with the East Renfrewshire Council eligibility criteria being more generous).

Pupils are not entitled to transport where a safe walking route exists. Safe walking routes are assessed by a health and safety professional in line with the West of Scotland Road Safety Forum guidelines. These guidelines are used across a number of local authorities.

The policy clarifies the provision of privilege transport. This is where pupils can pay to utilise surplus remaining space on any existing school transport vehicles. Given the charge for accessing a place, it may be considered that this prevents those with lower incomes from accessing this discretionary service. However, it should be noted that the Council is providing transport in line with its statutory responsibilities which are not affected by privilege transport.

The policy helps to advance equality of opportunity by ensuring that all children and young people can arrive at school on time. Previously, the number of pickups resulted in pupils frequently arriving late.

### **3.5 In what ways, if any, would this policy foster or undermine good relations between groups of individuals?**

Consider aspects that may tackle prejudice or promote understanding between different groups. For example, ensuring new arrivals and refugees are given supports to integrate within local communities or an LGBTQI+ youth group provide training on LGBTQI+ experiences to a local faith group

The policy does not impact relations between groups of individuals.

#### 4. Impact on socio-economic disadvantage

**This section will assess how the policy may impact socio-economic disadvantage for individuals.**

**Socio-economic disadvantage** is where an individual is disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications. Socio-economic disadvantage can be experienced in both geographical communities and communities of interest i.e. a group that share a common characteristic or circumstance. In East Renfrewshire there are a number of communities, known as locality planning areas, where people are at greater risk of experiencing socio-economic disadvantage including,

- Barrhead – Dunterlie, East Arthurlie and Dovecothall
- Auchenback
- Neilston
- Thornliebank

Consider the policy itself and the way it will be implemented. How will this deliver different experiences for individuals in East Renfrewshire?

**4.1 In the section below consider how the policy may impact socio-economic disadvantage through reviewing the evidence, experience and needs of this group**

Characteristics/circumstances	Evidence, experience and needs- outline any data or research that shows how this group may be impacted (include sources)	Will the impact on this group be positive, neutral or negative and why?
Socio-economic	There is a correlation between socio-economic disadvantage and ASN.	Neutral The changes to the policy apply to all children and young people. Support will continue to be offered based on individual needs.
<p><b>4.2 Consider the impact outline in section 4.1, In what way would the policy alleviate or increase inequalities in socio-economic disadvantage?</b></p>		
<p>Consider common inequalities such as poorer skills and attainment; lower paid and less secure work; greater chance of being a victim of crime; less chance of being treated with dignity and respect; lower healthy life expectancy; lower feeling of control over decisions that affect you.</p>		
<p>The policy has a neutral impact and builds on existing practice in place for school transport provision.</p> <p>All school transport is delivered in line with the Council's statutory responsibilities.</p>		
<p><b>4.3 What opportunities are there within this policy and the way it will be implemented to promote inclusion, participation, dignity and empowerment of people experiencing socio-economic disadvantage?</b></p>		
<p>For example, a new health centre is being built and considers affordability of public transport options for residents.</p>		
<p>The principles of the new policy specifically reference the need to meet the needs of the pupil. This is key to the implementation of the policy.</p> <p>Schools continue to promote the Scottish Government's Free Bus Travel Scheme for young people aged under-22, with families encouraged to sign up and access public transport provision, both for travel to and from school as well as at other times.</p>		

**4.4 Is there anything in particular that will be done to address the multiple inequalities experienced by some people in Auchenback, Barrhead, Neilston and Thornliebank?**

No specific action intended above that outlined.

**5. Impact on Children's Rights:**

**This section must be completed if any potential impact on children and young individuals up to the age of 18 have been identified in sections 1-4.**

**5.1 Are there known impacts on children and young people within the subject matter of the policy?**

For example, changes to out-of-school services, employment support for parents, play parks.

Yes. Children and young people are the only users of school transport provision.

**If there is no impact on children and young people GO TO SECTION 6**

**5.2 In the section below outline the UN Convention on the Rights of the Child (UNCRC) General principle that is relevant, the particular groups of children that will be affected and how this will impact them**

Which <a href="#">General Principles of UNCRC</a> are relevant to this policy/measure?		Which particular groups of children and young people are affected by this policy? (e.g. young children, children with disabilities, children living in poverty, children in care, young people who offend).
Tick all that apply		
<p><b>Article 2</b> <b>Non-discrimination</b> Children should not be discriminated against in the enjoyment of their rights. No child should be discriminated against because of the situation or status of their parent/carer(s).</p>	x	All school transport provision is provided in line with the Council's statutory responsibilities.
<p><b>Article 3</b> <b>Best interests of the child</b> Every decision and action taken relating to a child must be in their best interests. Governments must take all appropriate legislative and administrative measures to ensure that children have the protection and care necessary for their wellbeing - and that the institutions, services and facilities responsible for their care and protection conform with established standards.</p>	x	All school transport provision is provided in line with the Council's statutory responsibilities.
<p><b>Article 6</b> <b>Life, survival and development</b> Every child has a right to life and to develop to their full potential.</p>	<input type="checkbox"/>	All school transport provision is provided in line with the Council's statutory responsibilities.



<p><b>Article 12</b>  <b>Respect for the views of the child</b>  Every child has a right to express their views and have them given due weight in accordance with their age and maturity. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body.</p>	<input type="checkbox"/>	All school transport provision is provided in line with the Council's statutory responsibilities.
<p>Which <a href="#">additional articles</a> are relevant to this policy/measure? List all that apply</p>		

In relation to the articles identified above, explain how the impact will be positive, negative or neutral.

Relevant identified Article of UNCRC	Impact category (Positive/Negative/Neutral)	Assessment of impact (including consideration of whether the policy might impact different groups of children and young people in any other way).
<p><b>Article 2</b>  <b>Non-discrimination</b></p>	Neutral/Positive	<p>The establishment of a clear policy on transport increases the transparency and consistency of transport provision for all children and young people, including those with disabilities.</p> <p>In terms of impact, the policy itself will be no direct negative impact on children/young people using school transport.</p>
<p><b>Article 3</b>  <b>Best interests of the child</b></p>	Neutral/Negative	<p>The policy is highly unlikely to have a negative impact on children's wellbeing. Should such a situation arise,</p>

		<p>systems are in place to ensure that changes can be made in response to individual pupils' needs.</p> <p>The policy has the potential to impact negatively on young carers. The department will continue to work closely with schools to identify any individual young people affected in this way, and provide additional support to meet their needs.</p>
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**5.3 How will this policy advance or undermine the rights of children and young people?**

Explain how the policy can strengthen or weaken the rights of children and young individuals

Largely neutral impact. The policy has been developed in respect of the Council's statutory responsibilities for the provision of school transport, following consultation with relevant stakeholders and building on the existing provision of transport. Where there is potential for negative impact on young carers, this is mitigated by the sharing of information between schools and the department so that provision can be adjusted to meet young people's needs.

**5.4 How will this policy protect and promote the wellbeing of children and young people?**

For example promoting physical activity and healthy eating.

The policy ensures that all children and young people can access transport equitably in line with their needs. School transport is provided in line with the Council's statutory responsibilities. Where transport is not provided, families are encouraged to consider alternative active travel options for travelling to and from school, including cycling, park and stride and walking bus options. Safe walking routes are assessed by the department's health and safety advisor and available for families to support walking to and from school.

## 6. Contractors

### **6.1 Will the policy be carried out by contractors or suppliers?**

This includes fully or partially. If yes, how will you incorporate equality expectations into the contract?

School transport provision is carried out by a range of providers, including independent bus contractors, minicab services and internal Council transport.

Schools work closely with both independent and council providers to ensure that drivers are aware of individual pupils' needs.

## 7. Outcome of assessment

You have completed sections 1-6 above and assessed the impact of the policy on individuals with protected characteristics, those experiencing socio-economic disadvantage and children and young people. The following section outlines your decision based on this assessment, mitigations and actions that can be taken to reduce any negative impacts.

### **7.1 Having assessed the impact of the policy under sections 3,4 and 5 select the most appropriate outcome**

Which option below best describes your next steps?

Continue the policy as is

Adjust the policy

Stop the policy

**7.2 Are there any significant and relevant information gaps that have not been filled during the development of this policy and how do you plan to address these during the life of the policy?**

No

**7.3 Briefly summarise how your evidence and assessment demonstrates any potential impacts, both positive and negative, on groups with protected characteristics from this policy?**

Although we recognise that the policy has the potential to be perceived as negatively impacting on children and young people with additional support needs, a number of mitigating factors have been considered to ensure that all children and young people can continue to have fair and equitable access to transport. These are outlined below.

We recognise that the policy has the potential to have an impact on families' practical arrangements for transport, however this is not a direct impact on children and young people.

The alignment with mainstream transport will result in the presumption of collection point use to improve the pupil experience on school transport.

Families have been consulted on the proposals with all feedback and comments included in the report submitted to Committee.

Where any child or young person is unable to access collection points or this option is assessed as not being appropriate, provision will be made to ensure that pupils can continue to access school transport via alternative means. The department will continue to work closely with schools to ensure that information about individual pupils' needs in connection with transport is shared and acted upon.

**7.4 Briefly summarise how your evidence and assessment demonstrates any potential impact, both positive and negative, on individuals and communities experiencing socio-economic disadvantage from this policy?**

There is a neutral impact on individuals experiencing socio-economic disadvantage. The policy codifies the existing practice already in place.

**7.5 Briefly summarise how your evidence and assessment demonstrates any potential impacts, both positive and negative, on the rights of children and young people from this policy?**

There is a largely neutral impact on children's rights. The policy codifies the existing practice already in place. Where young carers may be negatively impacted, processes are in place to allow additional needs to be identified and individualised support provided.

**7.6 How long will this policy be in place and when is it scheduled for review?**

Is this a temporary or permanent change and are there plans to review the policy?

The policy is a permanent introduction.  
The existing transport policy has been in place, albeit in a more informal basis, since the beginning of the 2006/7 school session.  
There are no plans to review the policy on an ongoing basis.

**7.7 Based on the findings from this impact assessment, outline any mitigating actions that will reduce the impact caused by the policy on individuals, including children and young people. The actions should also outline the communication and implementation of the policy.**

Identified adverse impact	Mitigating actions	Timeline	Responsible person
Individual pupils with additional support needs may experience challenges in accessing school transport.	Support in place to ensure families unable to access transport via collection points are able to apply for alternative provision which ensures their needs can be met. This will be communicated to families to minimise concern. The Education Dept will continue to work closely with schools to ensure that where individuals demonstrably require additional support outwith the standard policy provision, this can be provided.	Aug 23	Schools HTs Education Department
Some young carers may experience additional barriers to accessing education	Where young carers may be negatively impacted, processes are in place to allow additional needs to be identified and individualised support provided. School ASN coordinators will be made aware of changes to policy. The department has in place processes to identify young carers and provide additional support to overcome barriers to education.	Aug 23	Schools HTs Ed Dept ASN Coordinators

## 8. Approval

If the full impact assessment has been completed, complete below.

<b>Name of policy:</b>	Home to School Transport Policy
<b>Date approved:</b>	8/6/23
<b>Approved by:</b>	Graeme Hay Education Snr Manager
<b>Department:</b>	Education

## 9. No assessment required

If the screening has indicated a full assessment is not required, complete below.

Policy/Decision Title	
Department/ Service	
Responsible officer for taking decision	

Rationale for decision	<b>Please record why an assessment is not required and what your justification is for making that decision. This must include confirmation that the policy has no relevance for people with protected characteristics or impact on human rights or socio-economic inequalities.</b>
<b>Declaration:</b> I confirm the decision <u>not</u> to carry out an Equality, Fairness and Rights Impact Assessment has been authorised by:  <b>Name and Job Title:</b>  <b>Date Authorisation given:</b>	