

# Community Impact Assessment

**Name of Proposal: Removal of Your Staffordshire Card**

**Project Sponsor (if applicable):**

**Project Manager (if applicable) or Lead: Clive Thomson**

**Date: February 2019**

## Completing a CIA

- A CIA will help you to identify the potential **impacts, risks and benefits** of your proposed policy, service or project. Doing this at an early stage enables engagement and research to be undertaken to identify actions that will either **lessen the risk** or **maximise the benefits**. The assessment will also help you to identify mitigating factors whereby risks may be balanced out to an extent by the benefits.
- This template should be used to support the development of a proposal during the **planning stage**, therefore supporting the council's approach of [Achieving Commissioning Excellence](#).
- A good CIA will involve input from more than one person. A **Project Team** should be identified with different, but relevant expertise to ensure that a full range of views are considered.
- **Engagement and/or consultation** should take place with appropriate and representative groups of people that are most likely to be affected. This must then be used to help shape the design/outcomes of the project. Please note that due to the publication of CIAs, it is advisable not to record personal details of members of the public, such as names or addresses.
- **Once completed**, the main findings from your CIA should be transferred to the '**Checklist and Executive Summary**' template. Then both documents need to be approved/signed off by the appropriate people. Depending on the size of your project, this could be your manager, project lead, sponsor or SLT.
- For CIAs that are going to **Cabinet**, only the '**Checklist and Executive Summary**' should be submitted as part of the Cabinet Papers. The full CIA document should be submitted as a **Background Paper**.

## Completing the CIA template

This table describes what is required when completing the key sections of your assessment.

Which groups will be affected	Benefits	Risks	Mitigations / Recommendations
<p>Which groups of people will be impacted by the proposed policy, service or project? This could be people in a particular area, a street, or a group of people with similar characteristics e.g. older people, young people or people with care needs.</p> <p>Also consider staff, residents and other external stakeholders.</p>	<p>Think about the impact the proposal may have on each of the different category areas, and identify the benefits of each decision.</p>	<p>Think about the impact the proposal may have on each of the different category areas, and identify the risks associated with the proposal.</p>	<p>Set out any recommendations as to how the benefits will be maximised and the risks minimised.</p> <p>Also highlight any trade-offs that may occur.</p>
<p><b>Evidence Base: (Evidence used/ likelihood/ size of impact)</b>            How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?            E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/ Consultation – with partners, the public, the voluntary sector.</p>			

Use the following template to highlight the impacts of your proposal on each of the following categories: the Public Sector Equality Duty (PSED), Health and Care, the Economy, the Environment, and Localities/ Communities.

# Community Impact Assessment Template

**Public Sector Equality Duty (PSED)** – Use this section to identify if the proposal will impact on our legal obligations under the Equality Act 2010 for both residents and staff. In summary, those subject to the general equality duty must have due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between different groups and foster good relations between different groups.

Please consider:

- Who is currently using the service, across the protected characteristics?
- What do we know about their experiences and outcomes?
- What relevant information is available from the Census and population trends data?
- What were the findings of the engagement/consultation?
- Is there any relevant national, regional and/or local sources of research/evidence available?
- Is there any relevant information from partners or voluntary, community, social enterprise organisations?
- What is the analysis of the impact on those with relevant protected characteristics?

Protected Characteristics:	Which groups will be affected	Benefits	Risks	Mitigations / Recommendations
<ul style="list-style-type: none"> <li>• <b>Race</b></li> </ul>	<p>The proportion of population from minority ethnic groups in Staffordshire is 6.4% which is significantly lower than the regional proportion (20.8%) and the national proportion (20.2%). However, the rate in East Staffordshire (13.8%) is higher than other districts/boroughs and in the wards of Anglesey (50.3%), Shobnall (41.2%), Eton Park (32.3%) and Burton (31.4%) the rates are considerably higher than the national average.</p> <p>It is not possible to analyse bus usage by minority ethnic groups,</p>	N/A	N/A	N/A

	<p>and the engagement process did not request this information.</p> <p>This characteristic does not form part of the eligibility criteria for bus passes.</p>			
• <b>Disability</b>	<p>The changes are unlikely to have any specific impact on disability. The Your Staffordshire card criteria was purely based on age and residence.</p>	N/A	N/A	<p>People with disabilities may qualify for an English National Concessionary Travel Scheme pass where travel would be free</p>
• <b>Sex</b>	<p>The changes are unlikely to have any specific impact on gender. In all districts and boroughs of Staffordshire except Stafford, females make up a greater proportion of the total population than males do, but it is not possible to split bus passenger numbers by gender.</p>	N/A	N/A	N/A
• <b>Age</b>	<p>Age is one of the protected characteristics that will be negatively affected most by the end of the Your Staffordshire Card.</p> <p>Staffordshire has a lower proportion of residents under 16 (17.2%) than both England (19.1%) and the West Midlands (19.6%). In Staffordshire both East Staffs (19.4%) and Tamworth (19.3%) have a higher</p>	<p>The level of bus services will be retained, young people will still be able to travel by paying the fare.</p> <p>Operators could offer a commercial discount.</p>	<p>Removal of the card could affect young people attending college or further education or employment.</p> <p>The removal of the card could also prevent young people in rural areas taking part in clubs</p>	<p>Some operators currently do offer annual passes that are comparable to the cost of using the Your Staffordshire Card.</p> <p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator's Forum, share anonymised feedback from young people, and encourage operators to review their commercial</p>

	<p>than average proportion of residents under 16.</p> <p>In 2017/18 there were 1 million journeys made with the Your Staffordshire Card of which 34.9% were made by Under 16's and 65.1% were made by 16-19-year olds. There has been a reduction of 58.3% in journeys from 2.4 million in 2011/15</p> <p>In March 2016 there were over 31,998 YSC pass holders, as of 11/2/19 there are 11,774 pass holders a reduction of 63.2%. Under 16's accounted for 28.1% of pass holders and 16-19-year olds accounted for 71.9%</p> <p>The number of school journeys cannot be identified but 34.9% of journeys were made by Under 16s and 65.1% were made by 16-19-year olds.</p>		<p>and other leisure activities.</p> <p>Some of the comments received are:</p> <p>"I am writing to express my disappointment in finding out that the Staffordshire bus card is ending in August 2019. My children use their cards at least 6 days a week, every week to travel to school and to participate in sports activities representing their schools on a Saturday. Without this support, I am worried that my children will no longer be able to attend the school that they do, and they will be excluded from participation, only due to financial reasons."</p>	<p>ticketing options where ticketing options are limited, to help potentially minimise the financial impact on younger people.</p> <p>We will promote commercial ticketing offers where appropriate.</p> <p>We are working with members of the Youth Parliament and Youth Union who represent the views of young people across Staffordshire, to understand the impact of this change at a local level. We will support / facilitate meetings between these representatives and local bus operators.</p>
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			<p>“I am very disappointed to hear that the Your Staffordshire Card scheme is ending on 31 August 2019. As a family living in a rural community I feel that my children will become more isolated, as the cost will stop them using the facilities in our local towns. I wonder whether the frequency of anti-social behaviour will increase in rural areas, as a result of this? Yours disappointedly (Parent of three children)”</p>	
<ul style="list-style-type: none"> <li>• <b>Religion or Belief</b></li> </ul>	<p>The changes are unlikely to have any specific impact on religion/belief. Although a district breakdown of religion is not available, the 2011 census show that Christianity is still the main religion (60%).</p>	<p>N/A</p>	<p>Although we do not collect data on this protected characteristic, it is recognised that the end of the Your Staffordshire card</p>	<p>N/A</p>

	<p>However, despite population growth the number of Christians in Staffordshire fell from 650,000 in 2001 to 580,000 in 2011. At the same time, there has been a rise in the numbers of residents classing themselves as not having a religion. In line with the changing ethnicity in Staffordshire there has been a 5% increase in Islam in Staffordshire. Respondents' religion or belief characteristics were not provided in the public consultation.</p>		<p>scheme could have a financial impact on anyone accessing leisure and cultural opportunities, support groups, medical appointments, places of faith etc.</p> <p>"I am incredibly disappointed to find out that the above scheme is to be withdrawn as of 31st August 2019. I chose to send my daughter to the nearest Catholic high school to our home and was disappointed to find that she would not qualify for transport as it was not the catchment school, even though the school she attends is only 0.4 miles from the catchment school!"</p>	
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<ul style="list-style-type: none"> <li>• <b>Gender Reassignment</b></li> </ul>	<p>The changes are unlikely to have any specific impact on gender reassignment.</p>	<p>N/A</p>	<p>Although we do not collect data on this protected characteristic, it is recognised that the end of the Your Staffordshire card scheme could have a financial impact on anyone accessing leisure and cultural opportunities, support groups, medical appointments, places of faith etc.</p>	<p>N/A</p>
<ul style="list-style-type: none"> <li>• <b>Sexual Orientation</b></li> </ul>	<p>The changes are unlikely to have any specific impact on sexual orientation.</p>	<p>N/A</p>	<p>Although we do not collect data on this protected characteristic, it is recognised that the end of the Your Staffordshire card scheme could have a financial impact on anyone accessing leisure and cultural opportunities, support groups, medical appointments, places of faith etc.</p>	<p>N/A</p>

<ul style="list-style-type: none"> <li>• <b>Pregnancy and Maternity</b></li> </ul>	<p>The changes are unlikely to have any specific impact on pregnancy and maternity.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<ul style="list-style-type: none"> <li>• <b>Marriage and Civil Partnership</b> The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnerships in relation to employment issues.</li> </ul>	<p>The changes are unlikely to have any specific impact on marriage and civil partnership.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<ul style="list-style-type: none"> <li>• <b>Rurality / Isolation</b> Though not a protected characteristic of the Equality Act 2010, this is a relevant consideration.</li> </ul>	<p>The changes are likely to affect people living in a rural area. The proportion of people living in rural areas in Staffordshire is higher than in England (24% and 17% respectively). Some districts have a higher proportion than others: over a third (39.8%) of the population in South Staffs live in a rural area, 32% of the population in Stafford live in a rural area, 30.4% of the population in Staffs Moorlands</p>	<p>The level of bus services will be retained, young people will still be able to travel by paying a commercial fare.</p> <p>Operators may offer competitively priced commercial ticketing options for young people.</p>	<p>There is a risk of rural isolation, particularly in South Staffs, and Staffs Moorlands.</p> <p>There is a risk that other sections with the County Council will face increased pressures. Potentially in the number of home to</p>	<p>The ending of the YSC scheme should not have any direct impact on the level of bus services available across Staffordshire.</p> <p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator's Forum and promote commercial offers where appropriate. Many operators currently do offer annual</p>

	<p>live in a rural area and 29.5% of the population in Lichfield live in a rural area.</p>		<p>school transport requests based on safe walking routes/</p> <p>Bus services in rural areas tend to operate less frequency than in urban areas, for example a 2-hourly service, or 4 services per day is not uncommon.</p> <p>Comments from those that cannot afford to pay a fare to travel will be impacted upon – “Shocked &amp; disgusted that you have plans to scrap this card. We live in Little Haywood; the closest town is Rugeley. Without this card the bus will be £4.20 a return trip. With 2 young teens, we are now planning to move from the village. I do</p>	<p>passes that are comparable to the cost of using the Your Staffordshire Card, as well as a wide range of ticketing options to cater for different needs and travel patterns.</p> <p><b>Superfast Broadband</b> The roll out of superfast broadband across Staffordshire means that 96% of homes and businesses now have access to good and reliable internet speeds. This programme has been delivered in predominantly rural areas, connecting some of our most isolated communities, providing an alternative way to access education, services and information, and keep people connected. This will play a part in reducing the risk of rural isolation.</p>
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			<p>not drive &amp; will be unable to absorb this rise. One child suffers from anxiety &amp; rarely leaves the house without me &amp; always accompanies me unless in school. She is under both CAHMS &amp; Midland psychology. Without this card, she won't be able to as I cannot afford it. Our bus service has been cut massively, the fares have stayed the same. Less buses, none on Sundays, much more traffic on the road already due to this. The children struggling to get to school. Parents cannot afford this. More buses will get taken off due to people car sharing, as they are doing already in our village</p>	
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			<p>due to massive issues with school transport. I don't drive. I rely on public transport, as do my children. Having to move home due to your cuts, maybe as a council, you should try living the life you expect us to. Cut something that will impact so much on your own lives. “</p> <p>“I am a 17-year-old resident of Staffordshire and I've recently been made aware of that 'Your Staffordshire' care scheme ending. I live rurally (in Woodseaves) and I currently attend a full-time course at Stafford college, so I will rely on public transport heavily. The costs of bus travel without the 'Your Staffordshire' card is</p>	
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			<p>very costly over time. My question is why is the 'Your Staffordshire, card scheme ending, and will you provide any new scheme like this to address this issue. As I am under the age of 18 and still in full time education I may be entitled to some sort of free or discounted bus travel to my nearest college. Please contact me as possible as I am very unsure and worried about this issue."</p> <p>"I wish to object to the withdrawal of the young person's bus pass. For isolated/rural communities this bus pass was an essential for those going to 6th form or further education colleges. This</p>	
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			process is another example of the County Council reducing very useful services for minute savings.”	
<b>Impact on SCC Staff</b> If the proposal affects SCC staff, consider the workforce profile compared against the protected characteristics pre and post change, the impact of job losses, available support for staff, and HR protocols.	This proposal may affect some SCC employees financially, who’s family members used the YSC scheme to get to work. Although there is no data to confirm this.			

**Evidence Base: (Evidence used/ likelihood/ size of impact)**

- Consultation Results of Analysis Report [October to November 2018](#)
- [Staffordshire Observatory Local Authority Data Packs – https://www.staffordshireobservatory.org.uk/publications/thestaffordshirestory/Locality-Data-Packs.aspx#.XD34MGxLHVJ](https://www.staffordshireobservatory.org.uk/publications/thestaffordshirestory/Locality-Data-Packs.aspx#.XD34MGxLHVJ)
- Department for Transport statistics, table BUS0113, last updated December 2017 <https://www.gov.uk/government/statistical-data-sets/bus01-local-bus-passenger-journeys>

**Health and Care** – Use this section to determine how the proposal will impact on resident’s health and wellbeing, and whether the proposal will impact on the demands for, or access to health and care services. Please consider the Care Act 2014 and the Health and Social Care Act 2012.

<b>Category Area</b> (Areas highlighted are suggestions only and there may be other impacts in these categories)	<b>Which groups will be affected</b>	<b>Benefits</b>	<b>Risks</b>	<b>Mitigations / Recommendations</b>
<b>Mental Health and Wellbeing</b> Will the proposal impact on the mental health and wellbeing of residents or services that support those with Mental Health issues?	The proposals could affect people who use the bus services to access support groups and medical appointments	The level of bus service will be retained, passengers can still travel on the services by paying a fare.	Although we do not collect data on this protected characteristic, it is recognised that the end of the Your Staffordshire card scheme could have a financial impact on anyone accessing leisure and cultural opportunities, support groups, medical appointments, places of faith etc  “To stop this concession will undoubtedly mean that some people cannot afford to pay bus fares and this will lead possibly health issues because they are not experiencing trip outside their home.”	SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate. There are already commercial offers in some areas of the county that are better than the Your Staffordshire card, but this is not yet consistent across Staffordshire.  <b>Superfast Broadband</b> The roll out of superfast broadband across Staffordshire means that 96% of homes and businesses now have access to good and reliable internet speeds. This programme has been delivered in predominantly rural areas, connecting some of our most isolate communities, providing an alternative way to

			<p>“I hope dearly that if enough is said the council might reconsider. I know as well as anyone that money is tight but for this exact reason the young people of the district deserve this service to remain.</p> <p>To buy an operators bus discount pass a lot of money has to be found in the first instance. Many families (including mine) will find this very difficult and the children and young people will miss out on opportunities, even essential travel will be made difficult such as school journeys (we do not qualify like many in our village for free bus travel to our chosen school), this will, in turn gave an impact on school attendance, learning opportunities, and hence longer term social problems. Young people, whatever their background, need to be able to explore their surroundings socially and becoming excluded from this for children who</p>	<p>access services and information and keep people connected.</p> <p>It is recognised that more needs to be done to raise awareness of the benefits of digital technology, , to help reduce the feeling of isolation and loneliness.</p>
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			<p>live remotely will undoubtedly cause further problems. Bored young people historically have found themselves struggling socially and emotionally and I really don't need to spell out the impact this can have on local communities. I know very well there will be a counter argument to every point I have made, by someone far more important and affluent than I, there will be graphs and spreadsheets to support such counter arguments and my opinion will be dismissed, but I live in hope that the district will recognise that this scheme has helped countless young people enormously and the removal of it will do just the opposite. Sincerely and with many thanks for your time.</p> <p>“Shocked &amp; disgusted that you have plans to scrap this card. We live in Little Haywood; the closest town is Rugeley. Without this</p>	
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			<p>card the bus will be £4.20 a return trip. With 2 young teens, we are now planning to move from the village. I do not drive &amp; will be unable to absorb this rise. One child suffers from anxiety &amp; rarely leaves the house without me &amp; always accompanies me unless in school. She is under both CAHMS &amp; Midland psychology. Without this card, she won't be able to as I cannot afford it. Our bus service has been cut massively, the fares have stayed the same. Less buses, none on Sundays, much more traffic on the road already due to this. The children struggling to get to school. Parents cannot afford this. More buses will get taken off due to people car sharing, as they are doing already in our village due to massive issues with school transport. I don't drive. I rely on public transport, as do my children. Having to move home due to your</p>	
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			cuts, maybe as a council, you should try living the life you expect us to. Cut something that will impact so much on your own lives.”	
<b>Healthy Lifestyles</b> Will the proposal promote independence and personal responsibility, helping people to make positive choices around physical activity, healthy food and nutrition, smoking, problematic alcohol and substance use, and sexual health?	The proposal may affect both people who are able to make healthy lifestyle changes and people who rely on the bus services to access support to make changes to their lifestyle.	People may make positive choices around physical activity e.g. walking or cycling to get to places as opposed to using transport.  The option to travel by public transport will still be available, however they will have to pay a full fare.	People may not be able to access support groups that help them to make positive healthy lifestyle changes, if not financially able to pay a fare.	n/a
<b>Accidents and Falls Prevention</b> Does the proposal reduce or increase the risk of: falls in older people, childhood accidents, road accidents, or workplace accidents?	N/A	N/A	N/A	N/A
<b>Access to Social Care</b> Will the proposal enable people to access appropriate interventions at the right time?	The proposal may affect people accessing early intervention	The option to travel by public transport will still be available, however they will be required to pay an increased fare to travel.	Those that are financially not able to pay an increased fare may be more impacted upon, resulting in the need to access more intensive	N/A

	support groups.		Council services at an earlier stage.	
<b>Independent Living</b> Will the proposal impact on people's ability to live independently in their own home, with care and support from family, friends, and the community?	The proposal may affect people who rely on the bus service to be independent by placing additional financial pressure on them.	The option to travel by public transport will still be available, however they will be required to pay an increased fare to travel.	There is a risk that people who are independent may need to rely upon Council services if they cannot afford to pay an increased fare to travel.	N/A
<b>Safeguarding</b> Will the proposal ensure effective safeguarding for the most vulnerable in our communities?	The proposal may affect vulnerable people -	N/A	Comments from those that cannot afford to pay a fare to travel will be impacted upon. "This is disgraceful - yet again cuts that it affects the most vulnerable members of our society the most. Awful - please reconsider - our young people matter."	N/A

**Evidence Base: (Evidence used/ likelihood/ size of impact)**

LGA, Age UK and Campaign to End Loneliness 'Combating Loneliness – A Guide for Local Authorities' January 2016  
<https://www.local.gov.uk/sites/default/files/documents/combating-loneliness-guid-24e.pdf>

**Economy** – Use this section to determine how the proposal will impact on the economy of Staffordshire and the income of residents.

<b>Category Area</b> (Areas highlighted are suggestions only and there may be other impacts in these categories)	<b>Which groups will be affected</b>	<b>Benefits</b>	<b>Risks</b>	<b>Mitigations / Recommendations</b>
<b>Economic Growth</b> Will the proposal promote the county as a “go to” location for business, and make it easy for businesses to start up, innovate and expand?	People who use the bus to access training and/or employment	These people can still access the same services.	There will be an increased cost to accessing training and / or employment if needing to travel. This could have an impact on those on lower incomes or without an income, making it more difficult for employers to attract staff and trainees.	SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate. There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.

				The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing.
<b>Poverty and Income</b> Will the proposal have an impact on income? Will it reduce the gap between high and low earners?	People who will not be able to access training and/or employment	N/A	<p>There is a risk that those people that cannot afford to pay an increased fare could have reduced opportunities to attend work or training opportunities.</p> <p>The Greener Journeys report 'The Value of the Bus to Society'<sup>1</sup> states that a 10% improvement in local bus service connectivity in the 10% most deprived neighbourhoods across England would result in: 2.8% fall in income deprivation. There is therefore a risk that those areas most deprived in Staffordshire will see an increase in income deprivation.</p>	<p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator's Forum and promote commercial offers where appropriate. There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing.</p> <p>This will be raised and discussed with all local bus operators at the Staffordshire Bus Operators Forum (SBOF)</p>

<sup>1</sup> <http://www.greenerjourneys.com/wp-content/uploads/2016/10/The-Value-of-the-Bus-to-Society-FINAL.pdf>

			<p>“I am devastated you are withdrawing this card I live in Rugeley and my child attends the Friary In Lichfield, I just scrape by paying £11 a week on bus fare and if this price is doubled it will possibly result in her having to move schools.”</p> <p>“I was disappointed to read that the under 20 bus passes was being phased out and will be null and void next year? Clearly when I purchased my daughter's card I entered into a contract that I anticipated would be honoured by the Council until my daughter reached an age where she was no longer a young person. Should I be expecting a refund of the fee paid as the Council have not honoured the agreement that I entered into?”</p> <p>“My son lives in Burntwood and goes to college in</p>	<p>when they next meet in June 2019.</p>
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			Tamworth. He has to get 2 buses to get there which altogether costs him £5.20 a day and that is using his Staffordshire bus card. If this service is scrapped my son will probably not be able to afford to go to college.”	
<b>Workplace Health and Environments</b> Will the proposal impact on working conditions and the health of Staffordshire’s workforce?	N/A	N/A	N/A	N/A
<b>Access to jobs/ Good quality jobs</b> Will the proposal create the right conditions for increased employment in more and better jobs?	People who use the bus to access training and/or employment	N/A	<p>There is a risk that those people that cannot afford to pay an increased fare will have reduced opportunities to attend work or training opportunities.</p> <p>The Greener Journeys report ‘The Value of the Bus to Society’<sup>2</sup> states that a 10% improvement in local bus service connectivity in the 10% most deprived neighbourhoods across England would result in:</p>	<p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate. There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you</p>

<sup>2</sup> <http://www.greenerjourneys.com/wp-content/uploads/2016/10/The-Value-of-the-Bus-to-Society-FINAL.pdf>

			<p>2.7% fall in employment deprivation. There is therefore a risk that those areas most deprived in Staffordshire will see an increase in employment deprivation.</p> <p>“Good afternoon it's a real shame that youngsters of an age that they are too young to work or are working for a low minimum pay have to pay full adult rates. This could even deter some from getting on the jobs ladder due to transport costs. I know this is probably another government squeeze to save money but is it actually necessary?”</p> <p>I have recently received an email explaining that the Your Staffordshire Bus Card Scheme is to end in 2019. Quite frankly, I am appalled at this decision, and whilst I understand that you have to make cuts somewhere, this perhaps isn't the correct place to do so. I am someone who has</p>	<p>need to travel. In addition to this, operators regularly change their ticket range and pricing</p>
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			<p>relied on this card to travel to and from school - at the time, I didn't have a job so struggled to afford transport, and I can imagine that there are many other students out there in a similar position to me. Now that the card scheme is set to end, and bus prices will increase for teenagers, I can only imagine the negative impact that it will have on many. In my area, a return ticket costs £4 - therefore many will be paying £20 a week just to reach their place of education. I understand that you also offer other bus passes, but many of these are also rather expensive considering that many students either do not have jobs or are on a minimum wage if they do. On the other hand, I understand that those over 60 can travel on the bus for free. I know that they have contributed to society over their lives, but many pensioners ultimately have</p>	
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			more money than students do, and therefore it isn't really all that fair that they can travel for no cost whilst students are being forced to pay £2 a journey just to seek an education.	
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**Evidence Base: (Evidence used/ likelihood/ size of impact)**

Greener Journeys – The Value of the Bus to Society Report <http://www.greenerjourneys.com/wp-content/uploads/2016/10/The-Value-of-the-Bus-to-Society-FINAL.pdf>

**Environment** – Use this section to identify the impact of the proposal on the physical environment. How does the proposal support the utilisation and maintenance of Staffordshire's built and natural environments, thereby improving health and wellbeing and strengthening community assets?

<b>Category Area</b> (Areas highlighted are suggestions only and there may be other impacts in these categories)	<b>Which groups will be affected</b>	<b>Benefits</b>	<b>Risks</b>	<b>Mitigations / Recommendations</b>
<b>Built Environment/ Land Use</b>	N/A	N/A	N/A	N/A

Will the proposal impact on the built environment and land use?				
<b>Rural Environment</b> Will the proposal impact on the rural natural environment or on access to open spaces?	N/A	N/A	N/A	N/A
<b>Air, Water and Land Quality</b> Will the proposal affect air quality (e.g. vehicle, industrial or domestic emissions), drinking water quality or land quality (e.g. contamination)?	There will be several Your Staffs cardholders who will have access to a car. This could provide an alternative means of travel.	Non-YSC holders may be encouraged to use public transport to access employment, education and training if services are less busy.	Some cardholders may choose to travel by car rather than pay an increased fare, which could increase the number of vehicles on the road at peak times, having a negative impact on congestion and air quality.  Some comments are:  "Shocked & disgusted that you have plans to scrap this card. We live in Little Haywood; the closest town is Rugeley. Without this card the bus will be £4.20 a return trip. With 2 young teens, we are now planning to move from the village. I do not drive & will be unable to absorb this rise. One child suffers from anxiety & rarely leaves the	SCC will continue dialogue with bus operators through the Staffordshire Bus Operator's Forum, share anonymised feedback from young people, and encourage operators to review their commercial ticketing options where ticketing options are limited, to help potentially minimise the financial impact on younger people.  There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.  The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing

			<p>house without me &amp; always accompanies me unless in school. She is under both CAHMS &amp; Midland psychology. Without this card, she won't be able to as I cannot afford it. Our bus service has been cut massively, the fares have stayed the same. Less buses, none on Sundays, much more traffic on the road already due to this. The children struggling to get to school. Parents cannot afford this. More buses will get taken off due to people car sharing, as they are doing already in our village due to massive issues with school transport. I don't drive. I rely on public transport, as do my children. Having to move home due to your cuts, maybe as a council, you should try living the life you expect us to. Cut something that will impact</p>	
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			<p>so much on your own lives.”</p> <p>“Yet again it is the average person that takes the hit!! I have 3 girls two of which use the buses to come home after school and one which will be in the not too distant future. From £1.30 to £2.70 a huge difference I’m sure you would agree!”</p> <p>“It seems local schools are being shut left right and centre our children are travelling further and further to get to school yet there isn’t the means to support that and as always, it’s your average Joe that works hard pays their taxes that takes the biggest hit. So, come August 2019 I have the pleasure of instead of paying £19.50 per week I will be paying £40.50, or £162 per month and that’s just one way!! How ridiculous! The government encourages people to use public</p>	
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			transport to be greener, but actually it would probably work out more cost effective for us to all drive our children to and from school. Unfortunately, we don't all have that pleasure as we work!"	
<b>Waste and Recycling</b> Will the proposal affect waste (e.g. disposal) and recycling?	N/A	N/A	N/A	N/A
<b>Agriculture and Food Production</b> Will the proposal affect the production of healthy, affordable and culturally acceptable food?	N/A	N/A	N/A	N/A
<b>Transport</b> Will the proposal affect the ability of people/ communities/ business to travel? Will the proposal impact on walking/ cycling opportunities?	The proposals may affect people whose only means of travel is by bus, that are not financially able to pay an	People may make positive choices around physical activity e.g. walking or cycling to get to places as opposed to using transport.	People that need to travel that cannot afford to pay an increased fare and are not able to take alternative travel or able to walk or cycle to destinations, may become isolated.	N/A

	increased fare.			
<b>Noise</b> Will the proposal cause disruptive noise?	N/A	N/A	N/A	N/A
<b>Evidence Base: (Evidence used/ likelihood/ size of impact)</b>				

**Localities / Communities** – Use this section to identify the impact of the proposal on communities. How will the proposal strengthen community capacity to create safer and stronger communities? It is important to recognise the different localities and communities your proposal may impact upon, and identify any communities that could be more adversely impacted than others. District Commissioning Leads (DCL's) have a great deal of knowledge about their relevant locality and they must be engaged with as part of your Project Team at an early stage of the process.

<b>Category Area</b> (Areas highlighted are suggestions only and there may be other impacts in these categories)	<b>Which groups will be affected</b>	<b>Benefits</b>	<b>Risks</b>	<b>Mitigations / Recommendations</b>
<b>Community Development/ Capacity</b> Will the proposal affect opportunities to work with communities and strengthen or reduce community capacity?	N/A	N/A	N/A	N/A
<b>Crime/ Community Safety</b>	N/A	N/A	N/A	N/A

<p>Will the proposal support a joint approach to responding to crime and addressing the causes of crime?</p>				
<p><b>Educational Attainment and Training</b>  Will the proposal support school improvement and help to provide access to a good education?  Will the proposal support the improved supply of skills to employers and the employability of residents?</p>	<p>There currently 3,309 under 16 cardholders and 8,465 16-19 cardholders.  Between April 2017 and March 2018 Your Staffordshire cardholders made circa 1 million journeys with the majority of journeys being for educational/training purposes</p>	<p>N/A</p>	<p>The option to travel to school by bus may be chosen for a number of reasons, including developing independence, convenience and / or cost.</p> <p>Some families may not be able to afford the cost of a daily bus fare to get their child to school.</p> <p>This may result in increased non-attendance at school, reduced independence affecting the development of long term life skills, increase in vehicles on the road and on school sites.</p> <p>This change will have an impact on the most vulnerable young people.</p> <p>Some students may qualify for an entitled bus pass through the school transport department.</p>	<p><b>Suggestions / options –</b></p> <p>We have supplied information through our skills team to all colleges and we have emailed all schools to communicate changes.</p> <p>Anonymised feedback from young people will be shared with operators through the Staffordshire Bus Operator Forum.</p> <p>The County will continue to work with commercial bus operators and encourage them to review their commercial ticketing options where ticketing options are limited, to help potentially minimise the financial impact on younger people.</p> <p>Several operators offer competitive season passes for students.</p>

			<p>SCC may see an increase in the number of applications for this.</p> <p><b>Comments received during the engagement process include –</b>  “However, we have arranged her transport ourselves as this we feel is a small price to pay for a more suitable school for her secondary education. I appreciate that finances are always tight within the county council, but this scheme is a huge benefit to all local children and I feel it is very unfair that yet again facilities are being removed from the young people of this area.”</p> <p>“My daughter has just started a two-year course at Stafford College, we live in Rugeley and she gets the 825 bus every day. With her Your Staffordshire card she pays £1.30 each way,</p>	<p>Some educational establishments such as South Staffordshire college have organised their own bus services for students</p> <p>There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing</p> <p>We will continue to work with representatives of the Youth Parliament and Youth Union and ensure their feedback and voice is heard by local bus operators.</p>
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			<p>£2.60 a day. When this card stops then her fare will go up to £6.00 return a day.”</p> <p>“I understand that you may be facing unprecedented financial challenges, however, how does cutting costs of students travel to education (colleges and schools) make any sense!!! Us as parents are under financial pressure too, we HAVE to send our children to further education. This cutback is hits the working-class people again, who work hard to try and give their children the best start in life. Could there not be an option to increase the price of the card you buy a year, so you can still get discount bus fare. For example, you can buy a 16-25 rail card for £35 a year and this gives you discounted rail fares. I</p>	
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			<p>would be happy to pay this if it meant my daughter could continue to catch the bus for £2.60 a day!”</p> <p>“I urge you to continue to offer the Your Staffordshire Card for school children within the county. Without this support to get my children to school (15 miles from where we live) I will seriously have to consider taking them out of the school. As a Year 10 and Year 9 this would have a serious impact on their education. You should consider a long phase out of the card to allow current students to finish their education at their current school. If it has such a low take up, then surely the savings won't be that significant when compared to children's education. Instead of costing £5.20 a day to get my two children to and</p>	
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			<p>from school it is going to cost nearly £12 a day. This is not sustainable. I hope you consider this feedback and continue to offer the card.”</p> <p>“This Staffs Youth card enables me to send my son to college on the bus. I don't know how I can afford to send him next September for his second year without a reduced fare rate. VERY DISAPPOINTED in your service. Don't you dare increase the council tax next year”</p> <p>“My son lives in Burntwood and goes to college in Tamworth. He has to get 2 buses to get there which altogether costs him £5.20 a day and that is using his Staffordshire bus card. If this service is scrapped my son will probably not be able to afford to go to college.”</p>	
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			<p>“In view of the removal of this card, which assists many students in arriving at their choice of school/college, could you please advise when the school bus service will be available from Cheadle to Uttoxeter for my son to attend school? We currently pay £2.60 a day plus the £10 card charge as opposed to the £4.50 a day rate the public service bus would charge, as we believe there isn't a school bus from our area?”</p> <p>“I would like to know if there is any consultation on this matter? I have 2 under 16s and both will need to travel to and from school daily. This will be at a cost of £34 a week under this new proposal, that is a cost of £1,326 a year that an increase of £312 a year just to go to school.”</p> <p>“I am writing to express my disappointment and</p>	
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			<p>concern regarding the above decision. The potential impact of the increase of sending three children to school per day will be an increase of £7.80 per day and a total cost of £15.60 per day. This really is a great financial burden to consider and I hope you will reconsider this decision.“</p> <p>“I have just received information on this from my child’s school. I’m in shock! I do not know or have ever heard of this card. No wonder numbers have declined. Such a shame it’s got to end. If more people were aware I’m sure there would be more interest.”</p> <p>“I understand that the Staffordshire Card refers to our younger community who get a discounted rate to travel to school. Living in Alrewas most of</p>	
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			<p>our students are educated at The John Taylor High School in Barton under Needwood and it is not within safe walking distance. The route is either to walk along the very busy, high speed A38 or the canal towpath. Neither of these seem to me to be appropriate. Especially in the darker, colder, winter days. Do you feel that if discontinued, it may be a “good” reason for not attending school – i.e. shortage of money! Perhaps Staffordshire County Council should look at options of cost-cutting in their offices first.”</p> <p>“I am a regular user of the Staffordshire card and this will ruin my whole school life. I will have to pay an extra pound which adds up. I might not be able to go to the school I am going to as we won’t be</p>	
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			<p>able to afford the bus to get home and I can't be picked up. I honestly think it is a terrible idea stopping the Staffordshire card. Please don't stop the card. It would mean so much if you didn't stop it. Thank you Once again please carry on the Staffordshire card"</p> <p>Yet again it is the average person that takes the hit!! I have 3 girls two of which use the buses to come home after school and one which will be in the not too distant future. From £1.30 to £2.70 a huge difference I'm sure you would agree!</p> <p>It seems local schools are being shut left right and centre our children are travelling further and further to get to school yet there isn't the means to support that and as always, it's your average Joe that works hard pays their taxes that takes the biggest hit. So, come</p>	
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			<p>August 2019 I have the pleasure of instead of paying £19.50 per week I will be paying £40.50, or £162 per month and that's just one way!! How ridiculous! The government encourages people to use public transport to be greener, but actually it would probably work out more cost effective for us to all drive our children to and from school. Unfortunately, we don't all have that pleasure as we work!</p> <p>"I am emailing you to complain about how discounted bus passes for under 20s are being cancelled next year. The younger generation of the UK need public transport to be as cheap as possible, as they need to get to school, work or college easily. It made getting around much easier for us as it was</p>	
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			<p>cheap and convenient however after August 2019 this will not be the case. I am currently 15 years old myself and will be wanting to take part in apprenticeships and college when I leave high school in July next year and it is people like me who need this bus pass the most. Why would you cut the bus passes which still bring in money, rather than cutting the free bus passes for over 65s which cause you to lose money, yet you need to gain £35 million in the next 3 years? It does not make sense to me or anyone else I have discussed this major issue with. And as for your so called cuts, when you have recently sacked an employee earning £148k per year, an anonymous source has notified me that it in fact costs the council £800k to sack an employee, so you</p>	
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			<p>have now lost out on £752k.I hope you will see this email, and take appropriate action in regards to the bus passes and your cutting schemes.”</p>	
<p><b>Leisure and Culture</b> Will the proposal encourage people to participate in social and leisure activities that they enjoy?</p>	<p>The proposals may have an impact upon people who use the services to access social and leisure activities</p>	<p>May encourage people to engage in local social and leisure activities.</p>	<p>People may not be able to access as many, or the same, activities if they cannot afford to pay for travel.</p> <p>Comments from the engagement process – “I’m sure you’ve seen a similar comment to mine, however I don’t see why the card is being cancelled, I do not believe enough people own a Staffordshire Card for them to cause such a financial impact for the card to become a burden on the region’s economy. Why not at least investigate other options similar to the Staffordshire Card, for example, town specific cards that only allow you to travel around your town, or the immediate neighbouring towns. How am I as a student, with a low paying</p>	<p>People will still have the choice to access the same services and activities as the bus services will remain unchanged.</p> <p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate.</p> <p>There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing</p>

			<p>job, going to afford the bus between my place of work, or school. If you must cancel the Staffordshire Card I only ask you investigate other options available just to make the life of your residents easier.”</p> <p>“Bring back the card I cannot deal with this. The bus journeys are already an extortionate amount!!!! This is crazy.”</p> <p>“My question is how will teens prove their age once the Your Staffordshire cards expire? Many will end up being charged an adult’s fare as the driver may deem them to look older. I grew up in Birmingham and they had ‘under 16’ and ‘16-18’ (for those in education) bus ID cards for young people, will Staffordshire adopt a similar scheme?”</p> <p>“I am writing to express my disappointment in finding out that the</p>	
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			<p>Staffordshire bus card is ending in August 2019. My children use their cards at least 6 days a week, every week to travel to school and to participate in sports activities representing their schools on a Saturday. Without this support, I am worried that my children will no longer be able to attend the school that they do, and they will be excluded from participation, only due to financial reasons.”</p>	
<p><b>Volunteering</b> Will the proposal impact on opportunities for volunteering?</p>	<p>Current and potential volunteers</p>	<p>N/A</p>	<p>May impact upon people who use the bus services to access volunteering opportunities, as it may not be financially viable if having to pay an increased fare.</p>	<p>People will still have the choice to access the same services and activities as the bus services will remain unchanged.</p> <p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate.</p> <p>There are some very competitive ticketing options available from a number of</p>

				<p>operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing.</p>
<p><b>Best Start</b> Will the proposal impact on parental support (pre or postnatally), which helps to ensure that children are school-ready and have high aspirations, utilising a positive parenting approach?</p>	<p>The proposals may have an impact upon people being able to access pre and postnatal support groups and play groups</p>	<p>N/A</p>	<p>Those that cannot afford to pay a fare may find it more difficult to access services early in the morning.</p> <p>“I’m disappointed to learn that the Staffordshire card scheme will end August 2019. It has been a great scheme for my family as I do not drive and therefore rely on buses daily. The Arriva bus fare is expensive when compared to neighbouring county’s such as the West Midlands. If only they could lower their fares and not make a child’s day ticket just 50p less than an adult’s...what happened to a ‘half fare’</p>	<p>People will still have the choice to access the same services and activities as the bus services will remain unchanged.</p> <p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate.</p> <p>There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you</p>

			<p>for kids; the train services manage it!”</p> <p>“As a single parent with three children, I cannot afford to pay the full single fares for their travel to and from school each day. I recognise that season tickets are available offering some discounts. However, I do not have a disposable income high enough to pay out large sums of money upfront. I understand that the council do not wish to support the scheme due to financial pressures. However, this is not a free pass. It does have an upfront cost and the travel is only subsidised and not free, unlike in other local authority areas in the UK.”</p> <p>“I am extremely concerned about the cuts to the removal of the Your Staffordshire card used by young people to access reduced price bus travel.</p>	<p>need to travel. In addition to this, operators regularly change their ticket range and pricing</p>
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			<p>My daughter uses the number 8 Arriva bus to Parkside 2 to 3 times per week, only being an occasional user bus passes that are available or not suitable. She uses the Your Staffordshire card to access reduced price bus journeys. A single child ticket from town is £1.75 a ticket with the Your Staffordshire card is £1.30 a difference of: 45p on each occasion. This charge will increase social inequality, as fewer people will pay the increased costs and this will impact children's educational choices and social opportunities. Arriva has already reduced bus services in the evening. The last number 8 heading to Parkside leaves town at 18:41 meaning that I now need to go and collect her from town on some evenings. I thought it was one goal of the council to promote public transport, but this action increases traffic.</p>	
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			<p>Arriva has also cut the Sunday bus service. This is a further reduction of a socially necessary service.</p> <p>The reduction in bus services will have led to a reduction in use of the card.</p> <p>Thank you for your time to read this email and consider if there is a possibility of reducing the impact of the removal of the Your Staffordshire card.”</p> <p>“Totally disgusted cos it's the parents that pay for the passes &amp; the bus fares each time. Shame on you.”</p> <p>“Hi, I have just seen on my local bus that the card scheme is ending August 2019. My 16-year-old daughter has just started college and will be there for at least 2 years maybe 3. As a single working parent, I know this is</p>	
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			<p>going to be a big expense for me as she uses the bus daily to get to college I don't know how young people are expected to manage (and their parents) when cutbacks are being made. We live in Tamworth and this is the only discount offered for young people.”</p> <p>“I can see that you are ending the bus pass that allows me to send my child to school for a slight discount.</p> <p>When this ends it will cost me £16 per week to send her to school. When my youngest also starts next year, this will now cost me £32 per week. This is then going to cost us over £220 per term. We simply can't afford to pay these extra costs. If we don't send the kids to school, we get fined.</p> <p>What are we supposed to do?</p> <p>We live in Handsacre, come under Lichfield, pay</p>
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			<p>our council tax to Lichfield but apparently The Friary is not in our catchment. Instead it is a school in the Cannock Council. Any advice would be much appreciated.”</p> <p>“What a ridiculous turn of events. I have 2 children who travel from Biddulph to Chell to school every day. This means that from Aug 2019 I have to pay 4 x £2.30 trips, or £9.20 per day just to get them to school!!! Some maths for you; £9.20 x 5 = £46 per week to get my kids to school. Or in annual terms, for a 38-week term £1748! Which means before tax and insurance I have to earn over £2500 just for bus travel!”</p> <p>“You spend so much money on absolute GARBAGE and the best thing you can think to get rid of is bus passes, the most useful thing for students that have to get</p>	
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			<p>up to 4 buses a day? Smashing idea”</p> <p>“I hope dearly that if enough is said the council might reconsider. I know as well as anyone that money is tight but for this exact reason the young people of the district deserve this service to remain.”</p> <p>“To buy an operators bus discount pass a lot of money has to be found in the first instance. Many families (including mine) will find this very difficult and the children and young people will miss out on opportunities, even essential travel will be made difficult such as school journeys (we do not qualify like many in our village for free bus travel to our chosen school), this will, in turn gave an impact on school attendance, learning opportunities, and hence</p>	
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			longer term social problems. Young people, whatever”	
<p><b>Rural Communities</b> Will the proposal specifically impact on rural communities?</p>	<p>The changes are likely to affect people living in a rural area. The proportion of people living in rural areas in Staffordshire is higher than in England (24.1% and 17% respectively). Some districts have a higher proportion than others: over a third (39.8%) of the population in South Staffs live in a rural area, 32.2% of the population in Stafford live in a rural area, 30.2% of the population in Staffs Moorlands live in a rural area and 29.8% of the population in</p>	N/A	<p>Bus services in rural areas tend to operator less frequency than in urban areas, for example a 2-hourly service, or 4 services per day is not uncommon.</p> <p>Comments received through the engagement process regarding frequency of bus services include – “I am very disappointed to hear that the Your Staffordshire Card scheme is ending on 31 August 2019. As a family living in a rural community I feel that my children will become more isolated, as the cost will stop them using the facilities in our local towns. I wonder whether the frequency of anti-social behaviour will increase in rural areas, as</p>	<p>People will still have the choice to access the same services and activities as the bus services will remain unchanged.</p> <p>SCC will continue dialogue with bus operators through the Staffordshire Bus Operator’s Forum and promote commercial offers where appropriate.</p> <p>There are some very competitive ticketing options available from a number of operators, especially for those that need to travel every day.</p> <p>The options available vary considerably depending on where you live, where you need to get to, and how often you need to travel. In addition to this, operators regularly change their ticket range and pricing</p> <p><b>Superfast Broadband</b></p>

	<p>Lichfield live in a rural area.</p>		<p>a result of this? Yours disappointedly (Parent of three children).”</p> <p>“I hope dearly that if enough is said the council might reconsider. I know as well as anyone that money is tight but for this exact reason the young people of the district deserve this service to remain.</p> <p>To buy an operators bus discount pass a lot of money has to be found in the first instance. Many families (including mine) will find this very difficult and the children and young people will miss out on opportunities, even essential travel will be made difficult such as school journeys (we do not qualify like many in our village for free bus travel to our chosen school), this will, in turn gave an impact on school attendance, learning opportunities, and hence longer term social problems. Young people,</p>	<p>The roll out of superfast broadband across Staffordshire means that 96% of homes and businesses now have access to good and reliable internet speeds. This programme has been delivered in predominantly rural areas, connecting some of our most isolate communities, providing an alternative way to access services and information, and keep people connected. This will play a part in reducing the risk of rural isolation.</p>
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			<p>whatever their background, need to be able to explore their surroundings socially and becoming excluded from this for children who live remotely will undoubtedly cause further problems. Bored young people historically have found themselves struggling socially and emotionally and I really don't need to spell out the impact this can have on local communities. I know very well there will be a counter argument to every point I have made, by someone far more important and affluent than I, there will be graphs and spreadsheets to support such counter arguments and my opinion will be dismissed, but I live in hope that the district will recognise that this scheme has helped countless young people enormously and the removal of it will do just the opposite."</p>	
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<b>Evidence Base: (Evidence used/ likelihood/ size of impact)</b>				

Now transfer the main findings of this assessment to the '**Checklist and Executive Summary**' template. Then both documents need to be approved/signed off by the appropriate people. For CIAs that are going to **Cabinet**, only the '**Checklist and Executive Summary**' should be submitted as part of the **Cabinet Papers**. The full CIA document should be submitted as a **Background Paper**.