



Executive
19 September 2011

**Report from the Director of
Adult Social Services**

Wards Affected:
ALL

**Authority to agree changes to the Taxicard scheme in Brent
from October 2011**

1.0 Summary

1.1. This paper provides:

- an overview of the Taxicard scheme
- a summary of the changes implemented in Brent in January 2010 to reduce a forecast overspend in 2010/11
- the funding changes implemented by London Councils to make the funding arrangements for the Taxicard scheme sustainable in the medium term
- a summary of the consultation on options for the scheme in Brent, and
- the options Brent Council could implement now that the consultation has been completed.

2.0 Recommendations

2.1 This paper recommends the Executive should:

- Agree to implement Option 3 from 1 October 2011 in order to manage demand in the future and focus the scheme on those with the highest needs. This option is focused on the following changes:
 - Introduction of a mobility assessment to replace the current GP assessment for people who do not automatically qualify for a Taxicard
 - A reduced trip limit of 48 as the standard with provision to extend the number of trips based on clear criteria related to the mobility assessment, wider need and available circle of support
 - Re-introducing double swiping and continuing to allow 'roll overs' to ensure that Taxicard members have control over their allocation and can use it to meet their individual needs.
- Agree delegated authority (to Director of Adult Social Care in consultation with the Director of Finance and Corporate Services) to adjust the trip level if the monthly monitoring data from London Councils indicates there will be an overspend in 2011/12.

3.0 Overview of the Taxicard Scheme

- 3.1. The Taxicard Scheme was set up to allow London residents who have a mobility impairment that prevents them from using public transport, to travel in the contractor's licensed radio taxis at subsidised rates. This service is commissioned by London Councils and provided by ComputaCab.
- 3.2. To qualify for a Taxicard you must be unable or virtually unable to use buses or trains due to severe sight impairment, or have a permanent disability which seriously impairs their ability to walk. Automatic qualification for the Taxicard scheme is based on:
 - Receipt of High Rate Mobility Component of Disability Living Allowance (HRMCDLA)
 - Receipt of the War pension Mobility Supplement, or
 - Being registered blind.
- 3.4. In Brent people can also qualify for the scheme if an individual's GP confirms that the person is unable/virtually unable to use public transport. Different Boroughs use different methods to allow people who do not automatically qualify for the scheme to access the benefits.
- 3.5. The Taxicard scheme is one of a range of measures to provide concessionary transport within the borough. For instance:
 - *Freedom Pass*, which is automatically available to anyone over 65, people who are in receipt of HRMCDLA or people who are eligible after a Brent Mobility Assessment
 - *Blue Badges*, which are available to anyone who is in receipt of HRMCDLA, has War Pensioner's Mobility Supplement, is Registered Blind or is eligible after a Brent Mobility Assessment.
 - Provision of transport to assist individuals to access adult social care services e.g. through Dial-a-Ride and Brent Community Transport as well as independent taxis. This is available to those who qualify for community care support under s29 National Assistance Act 1948 and have no other means to access adult social care services.
- 3.6. Currently, there are 4,546 Taxicard members. 1544 of these have automatic qualification and 3,002 have qualified through a GP assessment.
- 3.7. London Councils works with all Boroughs to try to deliver a consistent service across London. It does this through a number of parameters including, Council subsidy per trip, member charge per trip, member trip limits, additional trip limits, and double swiping. These are set out in more detail 4.2.
- 3.8. Taxicard funding has been based on a tripartite formula with contributions from TfL, the Mayor and the participating Boroughs - although two Boroughs, Barnet and Redbridge, do not contribute to the costs of the scheme in their Borough.

4.0 Recent Changes to the Taxicard Scheme

- 4.1. The Taxicard scheme has grown considerably across London in recent years, but projected growth last year (2010/11) was even higher than expected. Therefore, in October 2010 the Transport Executive Committee (TEC) of London Councils agreed a co-ordinated response to manage a forecast overspend of £1.4m across London. The response was co-ordinated on the basis that if the measures recommended by London Councils were not implemented in an individual Borough that Borough would have to cover the additional costs incurred.
- 4.2. A report was presented to Brent Council Executive on 15th November 2010 outlining the recommended changes by London Councils TEC, and the following changes were agreed and implemented as of 4th January 2011:
- **The maximum subsidy per trip.** This is the maximum amount that TfL and the Borough will fund for a single trip. This plus the member charge per trip defines length of a journey that can be paid for with a single swipe of a Taxicard. In January the subsidy was reduced by £2, so the current maximum subsidy is (£8.30 day time, £9.30 in the evening, and £10.80 at night). This means that for every trip worth £10.80, the Borough pays £8.30
 - **Member charge per trip.** The member charge per trip was increased from £1.50 to £2.50. This means for every journey with a cost of up to £10.80 during the day (£11.80 evenings and weekends or £13.30 at night) the member pays £2.50. The member charge per trip had not increased for 15 years and now better reflects the price of bus travel
 - **Member trip limits.** Every London Borough sets a maximum number of trips per month and decides whether or not these trips can be rolled over to the next month(s). Currently in Brent members can have 8 trips per month (96 per year) and can roll them over if they don't use them
 - **Additional trips.** Individual Boroughs can also allow additional trips above the normal limit if there are exceptional circumstances. Any costs incurred from Taxicard members taking more than the agreed number of trips per year are to be funded by the participating Local Authority
 - **Double swiping.** Double swiping allows people to take longer trips at fully subsidised rates. For example, with a double swipe a member could take a trip with a value of £21.60 (£10.80 times 2) for £5. Without a double swipe the journey would cost £13.30 (£2.50 plus £10.80). Double swiping was stopped in January 2011 in Brent. This decision was in line with the original rationale for Taxicards – to allow members to take short journeys by taxi rather than public transport.
- 4.3. In addition to these measures, London Councils also agreed that Boroughs should put a moratorium on new members for the rest of the financial year 2010/11.
- 4.4. The majority of Boroughs (24) implemented all or most of these changes in January. However, three London Boroughs have since

reversed some of the changes. A detailed overview of the current position across London is set out at Appendix A.

- 4.5. The following bullet points summarise the level of service provision in Brent, before the changes in January 2011:
- There were 4,583 Taxicard members in the Borough. There was an increase of 355 members (8%) between April 2010 and December 2010 (when the moratorium on new members was implemented)
 - Up until January 2011, 3027 of the Taxicard members had used their card, and had taken an average of 23 trips each
 - On average, between April 2010 and December 2010, 1,617 Members used their Taxicard each month.
- 4.6. The level of service provision has changed since January when the changes were implemented. There are now 4,546 Taxicard members in the Borough – a reduction of 37 members. On average, between January 2011 and July 2011, 1,223 Members used their Taxicard each month (a reduction of almost a quarter).
- 4.7. The average cost per month in 2010/11 to the Borough was £71k before the measures were introduced in January. The implementation of the changes in January reduced the average cost per month in the last 3 months of the financial year to £40k, significantly reducing the overspend for 2010/11. This was mirrored across London. London Councils achieved an under spend for the budget as a whole, and this was used to fund overspends in Boroughs like Brent which still had an overspend even after implementing all the required changes.

5.0 Future funding arrangements

- 5.1. Historically Taxicard funding had been based on a tripartite formula with contributions from TfL, the participating Boroughs and the Mayor. Any overspend was met from a central TfL fund provided Boroughs ran the scheme within the agreed parameters.
- 5.2. Given the significant growth in the scheme, in Brent and across London, it was agreed at London Councils that the previous funding arrangements were no longer fit for purpose. Therefore, London Councils undertook a review of the management of the TfL funding for the scheme. A decision was taken by London Councils to distribute the funding to the participating Boroughs according to a formula and make them accountable for the costs in their Borough. It has been agreed between London Councils and TfL, that Borough money will be spent first before the TfL allocation is supplied. Therefore any underspend of funds will be from the TfL allocation and will be returned to TfL as applicable.
- 5.4. Various options and formulae were discussed and a report was presented to the TEC on 10th February 2011, where Boroughs agreed a formula for the redistribution of TfL's Taxicard funding based on:
- The number of Higher Rate Mobility Component of Disability Living Allowance (HRMCDLA) claimants
 - The number of residents over 65 in the Borough, and

- The number of active Taxicard members in the Borough.
- 5.5. As the impact of this new formula will have differing effects on the participating Boroughs, it was agreed that the transition to the new formula would be delivered over 3 years with the full effect being from 2014/15.
- 5.6 The TfL and Mayoral contribution to the Brent Taxicard scheme for the next four years is set out below:
- 2011/12: £537,044
 - 2012/13: £532,777
 - 2013/14: £524,718
 - 2014/15: £516,897

6.0 Consulting on the Options for the Future

- 6.1 In April 2011, under delegated authority a 12 week consultation began on the future of the Taxicard scheme because although the changes implemented in January had managed the immediate budget crisis, it was not clear at this point in time that:
- the scheme was targeted at those most in need,
 - the way it was structured, after the changes in January, reflected the needs of the members.
 - given the increased demand (at least 200 people are waiting to access the Taxicard scheme), the scheme was financially sustainable in the medium term given the overspend in Brent in 2010/11.
- 6.2 The consultation explored a range of options to ensure the scheme targets the available funding at those residents who are in greatest need. The full detail on the consultation can be found in the summary consultation report at Appendix B, but an overview is set out below.
- 6.3 The consultation ran from 11 April 2011 and finished on 4 July 2011. There were 4 public consultation meetings, which were attended by approximately 150 people in total. The questionnaire was sent to everyone with a Taxicard and was also available on the Brent website. 1007 paper responses were received and 48 online responses as well as a range of individual comments. The proposed changes were also discussed at a number of existing forums including: the Pensioners Forum (6 June 2011) and the Brent Local Improvement Network (9 June 2011).
- 6.4 The consultation was built around the 5 key proposals for change. These are set out below with a summary of the responses to each proposal.
- 6.5 **Mobility assessment.** It was proposed that a mobility assessment was introduced for those people who do not automatically qualify for a Taxicard. This would be a consistent set of tests that could be applied rather than rely on the discretion of individual GPs. Some concerns were raised about this proposal, but in general there was support for the proposal. 53% of the people who responded to the questionnaire

agreed with the proposal; 18% neither agreed nor disagreed, and 29% disagreed

- 6.6 **Concessionary travel schemes.** It was proposed that:
- People with a Freedom Pass should not be able to access the Taxicard scheme. There was strong opposition to this proposal
 - Blue Badge holders who are NOT owner drivers, should have a reduced trip allocation. Again there was significant opposition to this proposal
 - Blue Badge owner drivers should not be able to access the Taxicard scheme. There was some opposition to this proposal, but it was more popular than the proposals in the previous two bullet points.

The overarching point that was made about these three proposals was that Taxicard members should have the flexibility to use different schemes as appropriate to their needs and situation. The point was also made that making people choose between different schemes could actually increase costs if people chose the most expensive option for the Council

- 6.7 **Maximum number of trips.** The proposal was to keep the maximum number of trips per year the same. In both the meetings and the questionnaire responses this was broadly supported although consultees also suggested that there could be variable trip limits to better reflect different levels of need.

- 6.8 **Member charges and Borough subsidy.** The proposal was not to change the minimum charge (£2.50) (82% supported this proposal) or the maximum subsidy - £8.30 day time, £9.30 in the evening, and £10.80 at night (76% supported this proposal).

- 6.9 **Double swipes.** It was proposed that double swipes should not be reinstated. There was strong opposition to this proposal in the consultation meetings. However, the questionnaire responses were less clear cut: 1014 people responded to this question. 445 (44%) agreed with the proposal not to change the policy on double swipes, 440 (43%) disagreed with the proposal. 293 specific comments were received in answer to this question; the vast majority of which were supportive of reinstating double swipes.

- 6.10 A number of other themes and issues became clear through the consultation meetings:
- **Choice/flexibility.** The scheme needs to recognise all disabilities that may impact on a person's ability to travel, and to recognise how the impact may change day to day and over time. The Taxicard scheme should allow people to meet their individual needs in a personalised way

- **Quality of transport services.** A number of people challenged the quality of the Taxicard service, claiming that routes were not always direct and the meter was sometimes running before the journey started. A number of people also claimed that they needed to use the Taxicard scheme because buses are not accessible, it is difficult to get on and drivers often stop suddenly, so people do not feel safe
- **Hospital appointments.** It was clear that for a lot of people the Taxicard scheme is important for them because they use the scheme to attend hospital and other medical appointments rather than rely on hospital transport due to perceived difficulties with that service. Activity data suggests they account for approximately 20% of all trips
- **Budget for Taxicard.** Although the consultation and the consultation meetings were focused on how the Taxicard scheme could be redesigned to deliver the greatest benefit within a defined budget, a number of people challenged why the budget could not be increased within Brent or by lobbying more widely.

7.0 Options for Implementation

Option 1: Do not make any changes to the Taxicard scheme

7.1 The changes implemented in January have had a significant impact on the budget. The average monthly cost since April 2011 is £30k, so the forecast for this year is an underspend. It would be possible to open up the membership again and run the scheme with a maximum trip limit of 96 but without access to double swiping and still deliver within budget. This option is not recommended because

- it was made clear by those taking part in the consultation that they valued the availability of double swiping because of the choice and flexibility this permits. Without double swiping the scheme is likely to attract less use, even with an increased membership
- is not clear that the scheme is currently focused on those who are most in need within the borough
- nor would this option respond to the key issues raised by those who took part in the consultation as it does not afford flexibility and choice in the way service users can utilise the scheme.

Furthermore, although it will likely lead to an underspend, it has been agreed between London Councils and TfL, that Borough money will be spent first before the TfL allocation is supplied. Therefore, any underspend of funds will be from the TfL allocation and will be returned to TfL as applicable. In effect this means that less money would come to Brent to meet this need so Brent residents would not have the full benefit of this London wide scheme.

Option 2 – Implement the changes proposed in the consultation

7.2 This option again ensures that any financial pressures would be effectively managed, and the implementation of the mobility assessment would ensure that the scheme is more clearly focused on

those who are most in need within the Borough. However, user flexibility and choice would be restricted because double swipes would not be reinstated, and users would not be able to access other concessionary travel schemes to meet their individual needs and circumstances.

Again the likely consequence of this is that less people will be attracted to the scheme or will underutilise their allocation, preferring instead to rely more heavily on alternative provision within the local authority such as that provided by way of s29 National Assistance Act 1948. Again this is likely to result in a decrease in the money which is made available through this scheme from London Councils and possibly a consequential increase in the cost of transport provision under the Adult Social Care budget.

Option 3 – Implement a revised set of proposals that reflect the issues raised in the consultation

7.3 Unless Brent Council's contribution to the Taxicard scheme is increased significantly, there is no way to introduce increased flexibility without either:

- Reducing member's annual trip limits
- Restricting access to the scheme.

7.4 Although introducing a mobility assessment ensures that the scheme is targeted at those who are most in need, demographic pressures in the Borough and the number of people with HRMCDLA and with Blue Badges, mean that ultimately that there is a likelihood that membership will continue to grow which in turn creates a significant risk in managing the limited budget. Therefore, the best way to manage the potential pressure on the budget is by reducing the member's annual trip limit. Option 3 proposes a revised set of proposals that better reflect the outcome of the consultation and the budget pressure:

- Introduce the mobility assessment to target the scheme at those who are most in need. The consultation results demonstrate support for this proposal.
- Increase the flexibility in the scheme, maintaining 'roll overs', allowing people to continue to use different concessionary schemes and re-introducing double swipes. Again the consultation results demonstrate very clear support for these proposals.
- Reduce the trip limit to 48 per year (from 96). This is a new proposal although reduced/variable limits were discussed at the consultation events. As it was not formally proposed it is difficult to accurately reflect the response in the meeting, but varied trip limits were suggested by people in the meetings. In addition, in 2010/11, 2415 of the 3027 people who used the Taxicard scheme used less than 48 trips per year. Therefore, 80% of the members would be unaffected by the proposals. A further 10% used between 49 and 72 trips (with an average of 60 trips) and the final 10% used more than 72 trips (with an average of 90 trips). These figures have been adjusted to account for changes in the scheme in January 2011.

Those users who can demonstrate additional need for an increased trip limit could apply for exceptional allowance and this would be assessed on their individual circumstances based on clear criteria relating to the mobility assessment, level of need and the circle of support an individual has

- 7.5 This option targets the scheme at those who will be most in need, reflects the strong focus on choice and flexibility from the consultation, but is also likely to deliver within budget. There is still a risk of an overspend with this option, unlike the other 2 options. However, it is proposed that this is managed through making further adjustments to the trip limit in the future if necessary.

Responding to other issues raised in the consultation

- 7.6 Whichever option is implemented, there will be a need to address the other issues raised in the consultation, for example, the quality of the service by communicating more clearly to members what standards they can expect from the provider, and ensuring they are able to complain and that their complaints are addressed. There are also wider issues that will need to be considered such as the accessibility of other transport services, and the possibility of working more closely with health to mitigate for the fact that the majority of trips are to and from health appointments.

8.0 Financial Implications

- 8.1 The proposals outlined in this paper have been designed in response to the changes in the Taxicard funding arrangements which make individual Boroughs accountable for the Taxicard spend. They are designed to target limited resources at those most at need, while managing the potential demand in the Taxicard scheme.

- 8.2 The Taxicard budget for 2011/12 is set out below:
- | | |
|------------------------------------|-----------------|
| Brent contribution to trip costs | £168 532 |
| TfL and Mayoral allocation 2011/12 | £537,044 |
| Total Budget for Trips | <u>£705,576</u> |

Plus Brent contribution to administration costs £19,132

- 8.3 A summary of the financial implications of each of the options is outlined below. All options are predicated on a minimal increase in membership numbers.

Option	Financial Implications
<p>Option 1 Do not make any changes to the Taxicard scheme</p>	<ul style="list-style-type: none"> Monthly cost to the Borough is currently approximately £30k, which means the forecast for the full financial year is £360k London Councils allocation for Brent is £537k, so Brent would not receive all this funding as London Councils say it has been agreed between London Councils and TfL, that Borough money will be spent first before the TfL allocation is supplied.
<p>Option 2 Implement the proposals as set out in the consultation:</p>	<p>This option could deliver a reduction in membership. 1340 of the active users do not have a Blue Badge, so may not qualify if they have a mobility assessment.</p>

	<p>The 'unknown' and potential cost increase in this option is the impact of removing the flexibility of having access to a Taxicard and other concessionary schemes. This was supposed to reduce costs, but feedback from the consultation suggests some people may give up their Freedom Pass and/or Blue Badge to maintain their Taxicard, which could increase costs for the scheme. It is also foreseeable that a reduction in the use of this service could increase the Adult Social Care transport costs.</p>
<p>Option 3 Implement the revised set of proposals</p>	<p>Option 3 could deliver a potential reduction in membership as in Option 2 because of the introduction of the mobility assessment, but the increased flexibility in the scheme under this option could also make the scheme more popular.</p> <p>The proposed trip limit has been set at 48 on the basis that:</p> <ul style="list-style-type: none"> • Last year 2415 people used less than 48 trips (even when double swipes were available). The average number of trips was 23, which means the cost would be £461k. • 612 active members used more than 48 trips. If the maximum trip limit was set at 48 (all trip limits were reduced to 96 from January), then this would cost a further £243,821 • Therefore, the total cost of the scheme would be £704,844, which is within budget. <p>It is anticipated that higher trip limits would be available only where need and lack of alternative was demonstrated.</p> <p>The risk of an overspend in 2011/12 is based on all Taxicard members using all 48 trips for the last six months of the year. This would be a significant increase on the average number of trips. If this was to happen from 1 October, it would cost £602k, which would create a financial pressure of £75k in 2011/12. The proposal is that this is monitored after October and the trip limit amended if 48 trips is not affordable.</p>

8.4 To ensure that expenditure is contained within the allocated budget in 2011/12, there will be regular monthly monitoring of activity and spend data and appropriate action will be taken in accordance with the delegated authority to vary the annual trip limit as necessary.

8.5 The financial implications for the different options are significant and reflect the different outcomes.

8.6 It should also be noted that:

- The figures are based on current numbers of Taxicard members, which are expected to continue to grow

- If the cost of the scheme is reduced below the TfL formula funding level, TfL will reduce its funding to Brent potentially disadvantaging the residents of Brent
- Any significant reduction in the number of active Taxicard Members will have an impact on future funding levels
- Implementation plans and timelines will be different for different options. However, if people who do not automatically qualify require reassessments this could take up to 6 months to complete.

9.0 Legal Implications

- 9.1 The Taxi Card Scheme arrangements are made between the Council and other boroughs and TfL under S240 of the Greater London Authority Act 1999 which enables local authorities to enter into agreements with Transport for London for concessionary travel. Unlike the Blue Badge Scheme and Freedom passes which are required to be provided by law, Taxicards are a discretionary service. The Council together with other London boroughs entered an agreement to participate in the scheme in 2001.
- 9.2 The Taxicard Scheme is managed by London Councils Transport and Environment Committee on behalf of the participating boroughs under the joint committee arrangements. However, the terms of the scheme, including matters relating to discretionary eligibility and number of trips remain a matter for the individual Boroughs.
- 9.3 Whilst the taxi-card service is discretionary the Council is required by virtue of s2 Chronically Sick and Disabled Person's Act 1970 ['CSDPA'] to provide home based services for disabled and ill people ordinarily resident in their area where *'it is necessary to meet the needs of that person'*. These services extend to *"travelling to and from his home for the purpose of participating in any services provided under s29 National Assistance Act 1948 and s2 CSDPA"*. However when assessing if it is necessary to provide transport for an individual the council can take into account the availability of alternative transport provision. This includes access to concessionary schemes such as this one. As such this scheme can assist the Council to meet its statutory duty to those with community care needs.

10.0 Diversity Implications

- 10.1 The Equality Act 2010 section 149 requires the Council, when exercising its functions to have 'due regard' to the need to eliminate discrimination, harassment and victimization and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic. Under the legislation there are eight protected characteristics including age, gender, disability and race. This proposal will primarily impact on those with protected characteristics of age and disability. A full Equalities Impact Assessment has been undertaken and information resulting from the consultation has been used in this analysis. This is

attached at Appendix C. Members are respectfully asked to consider this document and its conclusions so that they are in a position to pay due regard to their duty under s149 Equality Act 2010 when reaching a decision on this policy.

- 10.2 The principle driving the consultation proposals is that the limited resources of the council should be targeted at those in the most need. In addition careful consideration has been given to ensure the proposal reduces the adverse impact on those with disabilities and the elderly either by ensuring that the scheme is redesigned to better meet the concerns of those who took part in the consultation and the objectives set out in s149 Equality Act.

Background Papers

London Councils TEC Report 10.02.11

London Councils TEC Report 17.03.11

Contact Officer

Phil Porter

Head of Service: Reablement and Safeguarding

Tel:020 8937 5937

Alison Elliott

Director of Adult Social Care

Appendix A – Current position

Borough	Increase minimum member charge to £2.50	Reduce subsidy by £2.00	Stop double swiping
Barking and Dagenham	Yes	Yes	Yes
Barnet	Yes	Yes	Yes
Bexley	Yes	Yes	Yes
Brent	Yes	Yes	Yes
Bromley 5	Yes	Yes	No
Camden	Yes	No	No
City of London	Yes	Yes	Yes
Croydon	Yes	Yes	No
Ealing 1	Yes	Yes	No
Enfield	Yes	Yes	Yes
Greenwich 2	Yes	Yes	No
Hackney 3	Yes	Yes	No
Hammersmith and Fulham	No	No	No
Haringey	Yes	Yes	Yes
Harrow 5	Yes	Yes	Yes
Havering	Yes	Yes	Yes
Hillingdon	No	No	No
Hounslow	Yes	Yes	Yes
Islington	Yes	Yes	No
Kensington and Chelsea	Yes	Yes	No
Kingston upon Thames	Yes	Yes	No
Lambeth	Yes	Yes	No
Lewisham	Yes	Yes	No
Merton	Yes	Yes	No
Newham 4	Yes	Yes	Yes
Redbridge	Yes	Yes	Yes
Richmond on Thames	Yes	Yes	No
Southwark	Yes	Yes	No
Sutton	Yes	Yes	No
Tower Hamlets	No	No	No
Waltham Forest	Yes	Yes	Yes
Wandsworth	Yes	Yes	Yes

Notes

1. LB Ealing reversed all its changes on 1 February 2011
2. LB Greenwich reintroduced double-swiping on 1/2/11
3. LB Hackney reintroduced double-swiping on 1/3/11
4. LB Newham has different charges for Saver and Standard trips

Appendix B

Taxicard Consultation: 4 April to 11 July 2011 Consultation Report

1. Background:

The London Taxicard scheme provides subsidised door-to-door transport in taxis and private-hire vehicles for people who have a serious mobility or visual impairments. It is funded by Transport for London (TfL), the participating London Boroughs and the mayor of London. The London Councils Transport and Environment Committee (TEC) manage the scheme on their behalf.

The number of people who want a Taxicard has grown considerably over recent years. Therefore, in October 2010 London Councils requested that all London Boroughs agree to a number of changes to the Taxicard scheme itself to manage the Taxicard budget across London. In addition, changes were proposed and agreed to the way the Taxicard scheme is funded in the future so that individual London Boroughs receive a fixed budget for their Borough. If costs exceed this defined budget, then the individual Borough will have to find the additional funding.

Therefore, Brent needs to change the way the scheme is run so that it can target the limited funding available at those residents who it will benefit most.

In April 2011, under delegated authority a 12 week consultation began on the future of the Taxicard scheme.

2. Consultation process:

The 12 week consultation started on 11 April 2011 and finished on 4 July 2011. The consultation was built around the 5 key proposals for change. The main focus for the consultation was:

- Four public consultation meetings held: 12th May, 26th May, 3rd June and 24th June. These meetings were attended by about 150 people in total. Each of these meetings followed the same format. A presentation which gave an overview of the consultation process (including the fact that the responses would be presented to Brent council Executive at the end of the summer); why the changes are required and what Brent Council is proposing. This was followed by an open discussion with the all the points being recorded
- The questionnaire, which was sent to everyone with a Taxicard with a pre-paid envelope, and was also available on the Brent website. 1007 paper responses were received and 48 online responses as well as a range of individual comments. The results for paper responses and the online version were broadly comparable.

The proposed changes were also discussed at a number of existing forums including: the Pensioners Forum (6 June 2011) and the Brent Local Improvement Network (9 June 2011).

3. Consultation responses: the proposals

The issues raised at the consultation meetings and the responses set out in the returned questionnaires are organized below according to the specific proposals and in a general comments section. The notes from each of the public meetings and the detailed analysis of the questionnaire responses are also available.

Proposal 1: introduction of a mobility assessment.

Access is currently based on meeting the automatic criteria or the provision of acceptable disability information by a doctor. The proposal was that in the future access would be based on meeting the automatic criteria or a satisfactory completion of a Brent mobility assessment.

Consultation meetings

General discussion at the meeting was neutral on this proposal. There were very few specific comments. However, in two of the meetings it was questioned whether a mobility assessment could 'know you better' than your GP, and questions were asked about how the mobility assessment works and how it could be accessed. There was also concern that any mobility assessment did not disadvantage people with particular disabilities, for example, people who are registered blind or who have a personality disorder.

Questionnaire responses

1037 people responded to this question. 547 (53%) agreed with the proposal, 29% disagreed and 18% neither agreed nor disagreed with this proposal.

Proposal 2: other concessionary travel schemes.

The proposal was that access to the Taxicard schemes would also be dependent on whether or not people accessed other concessionary transport schemes:

- If you have a Freedom Pass, you will no longer be able to access the scheme
- If you have Blue Badge and are an owner driver, you will no longer be able to access the scheme
- If you have a Blue Badge and are not an owner driver, your trip limit will be reduced from 8 per month to 2 per month.

Consultation Meetings

In the consultation meeting there was a strong negative response to stopping people with a Freedom Pass accessing a Taxicard. The main focus of the criticism was that the proposal would limit flexibility. People said that they took the bus when they could, on 'good days' or at certain times during the day when they were not so busy, and wanted to have the choice and flexibility to do this. The feedback on the Blue Badge proposals while not as strongly negative as for the Freedom Pass proposal was not positive. Again people felt that they should have the flexibility to choose the most appropriate mode of transport, and that removing the flexibility could increase costs and would certainly not help savings. For example, one person said that if they had to choose between a Blue Badge and a Taxicard, they would choose the Taxicard, which would be more expensive for the Council.

Questionnaire responses

However, the strongest response was against removing the Freedom Pass. 1023 people responded to the question on this proposal. 797 people (78%) of the people who responded to this question were opposed to this proposal.

The responses to the other two elements were more evenly balanced

- Of the 1022 people who responded to the question on this proposal, 42% disagreed with the proposal that owner drivers would no longer be able to access Taxicards. 40% agreed with this proposal and 17% neither agreed nor disagreed
- Of the 1019 people who responded to the question on this proposal, 49% disagreed with the proposal for a reduced trip limit if you are a Blue Badge holder but not an owner driver. 32% agreed with the proposal and 19% neither agreed nor disagreed.

No further changes to the scheme were proposed, but the changes that had been implemented in January were also highlighted to get feedback:

Proposal 3: trip limits

There is currently a trip limit of 8 per month although Brent Council funds higher trip limits above the maximum under special circumstances. Taxicard members can roll over 8 trips into the following month. It was proposed in this consultation that this does not change.

Consultation Meetings

This proposal did not provoke a lot of debate in the meetings. The overall feedback was that the trip limit should not change and people should be able to roll over trips because that gives them more flexibility. "If we have an allocation of 8 trips we should be able to choose how to use them/People should be able to use their 8 credits how they want." However, some people did say that 8 trips was not enough.

One additional proposal that was made was a for a variable trip limit linked to need. There was a discussion at each meeting about the balance between trip limits and flexibility and the impact this would have on the budget for the Taxicard scheme. In one meeting people rated 'double swipes' a higher priority than 'roll over' on monthly trips, and in another it was suggested that there should be a lower trip limit, but increased flexibility to roll over. However, people also asked why the budget could not be increased, so these trade offs were not necessary.

Questionnaire Responses

1038 people responded to this question, 816 people (79%) agreed that the trip limit should remain the same. 1034 people responded to the question about 'roll overs' and 808 people (78%) agreed that 'roll overs' should remain. 140 people (14%) felt that 'roll overs' should stop or change and 86 people (8%) neither agreed nor disagreed.

Proposal 4: a minimum charge/maximum subsidy

Currently, Taxicard members are required to make a £2.50 contribution to every trip, which leads to a maximum subsidy per trip of £8.30 day time, £9.30 in the evening and £10.80 at night. It was proposed in this consultation that this does not change.

Consultation meetings

Changes to the charge and maximum subsidy were not a focus in the meetings. When these issues were discussed it was mainly in relation to the delivery of the current service and the actual cost of journeys. For example, the fact that the meter is already running when the taxi arrives, which increases the cost. This issue was raised a number of times with one person asking if there was a fixed amount that should be on the meter when they are picked up.

Questionnaire responses

1021 people responded to the question about the minimum charge and 840 people (82%) agreed that the minimum charge should remain the same. 1016 people responded to the question about the maximum charge and 775 (76%) agreed that should not change. 215 people made additional comments about these two questions. The comments were wide ranging and included:

- Broader challenges to the proposed changes, for example, changes to the Taxicard service are targeting the most vulnerable, so charges should be reduced
- The impact of the service itself on the charges, for example, the impact of heavy traffic on the cost of the journey and the high cost of trips with this service compared to ordinary Minicabs

- range of positive comments about not changing the charge or subsidy.

Proposal 5: no double swiping

Currently, if a daytime trip costs more than £10.80 (£2.50, customer contribution, plus £8.30, Brent contribution), then the Taxicard customer has to fund the additional cost because double swipes are not allowed. Double swipes mean that a £21.60 journey can be taken for £5, rather than £13.30. Double swipes were stopped in January and it was proposed in this consultation that this does not change.

Consultation Meetings

This was the most discussed topic at the meetings. The consensus at the meetings was that double swipes were an essential part of the scheme, and the removal of double swipes has had a significant impact on the cost of journeys that people take using the Taxicard scheme. One person said that a double swipe was the minimum required to make the scheme useful, and another person said that a double swipe is often not enough to make some journeys, the specific example they gave was of a trip to Barnet.

Questionnaire Responses

1014 people responded to this question. 445 (44%) agreed with the proposal not to change the policy on double swipes, 440 (43%) disagreed with the proposal. 293 specific comments were received in answer to this question as well and the vast majority state that double swipes should be started again.

4. Consultation responses: themes

As well as setting out the feedback from the meetings as they relate to specific proposals in the consultation, below we have set out the broader themes that emerged, some of which are additional to what has been set out above, some of which cross cut the proposals:

- **Choice/flexibility.** People have individual and in many cases varying circumstances. The feedback in the meeting was clear about the need to recognise all the disabilities that may impact on a person's ability to travel, and to recognise how the impact may change day to day and over time. Therefore, it was clear that people value the flexibility in the Taxicard scheme (for example, double swipes/roll overs) and across the concessionary transport schemes (ability to use the bus on a good day, taxi on a bad day). This allows them to meet their needs in a personalised way
- **Quality of transport services.** A number of people challenged the quality of the Taxicard about routes taken and the meter running before the journey. A number of people also challenged the accessibility of the bus services
- **Hospital appointments.** It was clear that for a lot of people the Taxicard scheme is important for them because it is how they attend hospital appointments
- **Budget for Taxicard.** Although the consultation and the consultation meetings were focused on how the Taxicard scheme could be redesigned to deliver the greatest benefit for those who need the service most within a defined budget, a number of people challenged why the budget could not be increased within Brent or by lobbying more widely.

Appendix C - Equalities Impact Assessment

Department: ADULT SOCIAL SERVICES	Person Responsible: Alison Elliott Director of Adult Social Services
Service Area: Adult Social Care	Timescale for Equality Impact Assessment : Immediate
Date: 24.08.11	Completion date: 24.08.11
Name of service/policy/procedure/project etc: Taxicard scheme	Is the service/policy/procedure/project etc: New <input checked="" type="checkbox"/> <input type="checkbox"/> Old <input type="checkbox"/>
Predictive <input checked="" type="checkbox"/> Retrospective <input type="checkbox"/>	Adverse impact Not found <input type="checkbox"/> Found <input checked="" type="checkbox"/> Service/policy/procedure/project etc, amended to stop or reduce adverse impact Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Is there likely to be a differential impact on any group? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Please state below:
1. Grounds of race: Ethnicity, nationality or national origin e.g. people of different ethnic backgrounds including Gypsies and Travellers and Refugees/ Asylum Seekers Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Grounds of faith or belief: Religion/faith including people who do not have a religion Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
5. Grounds of sexual orientation: Lesbian, Gay and bisexual Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	6. Grounds of age: Older people, children and young People Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Consultation conducted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Person responsible for arranging the review: Phil Porter	Person responsible for publishing results of Equality Impact Assessment: Phil Porter
Person responsible for monitoring: Alison Elliott	Date results due to be published and where:
Signed:	Date:

1. What is the service/policy/procedure/project etc to be assessed?

Proposed changes to the Taxicard service, which have been devised to ensure that the scheme is targeted at the people with the most need.

2. Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet? How does it differ from any existing services/ policies etc in this area?

Context

The Taxicard Scheme was set up to allow London residents with a mobility impairment that prevents them from using buses or trains to travel in the contractors' licensed radio taxis, black cabs or Private Hire Vehicles at subsidised rates. The aim of the scheme is to facilitate access and travel within the community.

Eligibility Criteria

- Resident within one of the participating London Boroughs
- The individual must be unable or virtually unable to use buses or trains due to severe sight impairment or blind, or have a permanent disability which seriously impairs their ability to walk. This is assessed based on either the applicant being in receipt of High Rate Mobility Component of DLA which is an automatic qualifying benefit for the scheme or the individual's GP confirming in their opinion the individual is unable/virtually unable to use public transport.

The Taxicard Scheme is one of a number of concessionary fares services for Disabled People. The other services include the Blue Badge Scheme, which entitles the badge holder to park in specially designated parking places, and Freedom Passes, which entitles the pass holder to free public transport. Both Blue Badges and Freedom Passes are assessed on either:

- the applicant being in receipt of High Rate Mobility Component of DLA, which is an automatic qualifying benefit for the scheme, or
- a mobility assessment, which identifies that the individual has severe mobility limitations and in respect of Blue Badges is virtually unable to walk.

Unlike the Blue Badge Scheme and Freedom passes which are statutory services provided under primary legislation, Taxicards are a discretionary service and provided under an agreement through The London Councils.

Scheme Administration

The scheme is managed on behalf of the participating London Boroughs by the London Councils with funding from TfL, the Mayor and individual London Boroughs. Residents submit their applications to their Local Authority for checking of eligibility and eligible forms are forwarded to London Councils for the cards to be issued.

Recent changes to the scheme

The management reporting data from the outset of 2010/11 by the London Councils identified significantly increased activity rates across all the participating boroughs and as a result by October 2010 a projected overspend of £1.4m was being forecast. In Brent by November 2010 the increase in activity rates was 57% when compared to the previous year.

London Councils in response to the increasing take up and use of taxicards prepared a report which was presented to the Transport and Environment Committee (TEC) on 14th October 2010. The report's recommendations to the boroughs on measures to be implemented to bring the budget in line and to manage the projected overspend for 2010/11 as of 15th November 2010 are as follows:

- To increase the minimum customer contribution from £1.50 to £2.50
- To reduce the maximum subsidy by £2.00 per trip
- To end double swiping - this is where two subsidised fares could be used together on one trip. If boroughs wished to continue for double swiping to be available, the costs would be borne by the individual borough
- That boroughs fund their own additional Taxicard trips for those Disabled People who had been allocated more than the standard allowance of trips per year.
- Moratorium on new members joining the scheme.

A report was then presented to Brent Council Executive on Monday, 15 November 2010 at which it was agreed that:

- that in light of further information received from London Councils, agreement be given to a moratorium for all new applicants
- that authority be delegated to the Director of Housing and Community Care to agree to the recommended budget control measures with the London Councils to pull the spend back in line with the budget for 2010/11.

Therefore, all of the changes outlined above were implemented in order to manage the budget pressures across London and in Brent.

Consultation on further changes to the scheme

These changes ensured the short term sustainability of the scheme. In April 2011, under delegated authority a 12 week consultation began on the future of the Taxicard scheme because it was not clear at this point in time that:

- the scheme was targeted at those most in need,
- the way it was structured, after the changes in January, reflected the needs of the members.
- given the increased demand (at least 200 people are waiting to access the Taxicard scheme), the scheme was financially sustainable in the medium term given the overspend in Brent in 2010/11.

The consultation was based around 5 key proposals:

- Introduction of a mobility assessment for people who do not have automatic access to the scheme
- Making access to the Taxicard scheme (and/or trip limits) dependent on not accessing other concessionary travel schemes
- Retaining the current trip limit of 96 trips per year
- Confirming the minimum charge and maximum subsidy for each trip
- Not reinstating double swipes.

The 12 week consultation started on 11 April 2011 and finished on 4 July 2011 (more detail is provided in section 7). A summary of the responses and feedback from the meetings is set out in detail in the Summary Consultation report. The consultation process led to significant changes in the proposed changes put to the Council Executive, which are:

- Introduction of a mobility assessment for people who do not have automatic access to the scheme – to ensure that those most in need access the service
- Increase flexibility in the scheme – not making access dependent on access to other concessionary schemes, retaining 'roll overs' for trips and reinstating double swipes
- Reduce the annual trip limit to 48 trips (from 96).

These changes were proposed in response to the consultation and the need to deliver the scheme within a defined budget.

3. Are the aims consistent with the council's Comprehensive Equality Policy?

The aims of the Taxicard Scheme are consistent in that the service does not set out to intentionally discriminate against any of the groups in the Equality Policy or against any individual person on those grounds. The scheme positively aims to improve access to and within the local community for Disabled People of all ages. The changes proposed reflect the need to manage the budget, and the focus of the scheme on people in need means that any changes to the scheme will have a positive impact on these groups as it ensures that the scheme remains sustainable in the medium term. The changes may have a particular impact on those people who have less need, defined by whether or not they meet the criteria set out in the mobility assessment, however any adverse impact would be mitigated because those who no longer qualify for the scheme would be signposted to alternative support as detailed below.

4. Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/health etc? What are the reasons for this adverse impact?

There is no evidence to suggest that the changes will have an adverse impact on the basis of race, gender, faith, or sexual orientation.

The Taxicard scheme is focused on supporting people with a disability (of any age). As stated in the previous section this means that any changes to the scheme will impact this group. However, the proposed mobility assessment will make the application for a Taxicard more transparent and equitable. The clear criteria for a higher trip limit based on the mobility assessment score, level of need and other support (including access to other funding sources) will also increase transparency and ensure the resources are targeted at those with the most need.

For people who no longer meet the criteria after a mobility assessment, the implications will differ on the basis of age, but not because of this scheme. For example, Freedom Passes are available to everyone over the age of 60 (eligibility age increasing by phases to 65 by 2020), so if a person aged 70 does not meet the criteria for a Taxicard after a mobility assessment, they will still have their Freedom Pass. If somebody aged 45, does not meet the criteria after a mobility assessment, they will not be able to access a Freedom Pass. However, in both cases, the team that administers the Taxicard scheme would offer information and advice on other discretionary and community based services that may be available.

The increased costs explicit in the proposals that were consulted on may also have an impact, and this may also have a differential impact across age groups – again because of other schemes. For example, there is some evidence to suggest that there could be an adverse impact for people over 65. People aged under 66 can access the Higher Rate Mobility component of Disability Living Allowance (HRMCDLA), which is provided to assist with transport costs and is therefore an eligible source of assistance to support additional costs experienced by any changes to the Taxicard scheme. For people aged 66 and older, who will not be in receipt of HRMCDLA, the impact of the changes, will be dependant upon their own financial circumstances. Because socio-economic conditions are not protected characteristics under the Equality Act 2010 the Council does not record information in relation to the financial circumstances of certain groups, however it is generally believed that a high percentage of Elderly and Disabled People live in lower income groups and therefore it would be expected that those not in receipt of HRMCDLA will experience a greater impact and restrictions on their capacity to fund longer trips. However, as stated above this will be taken into account when considering applications for higher trip limits and any adverse impact therefore minimised.

5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make you judgement separately (by race, gender and disability etc).

The decisions made about the scheme have been based on:

- The consultation on proposed changes (questionnaire responses and discussions at the consultation meetings and other public forums). More information provided in section 7, and a summary of findings from the consultation is available separately.
- The activity data that is available from London Councils who administer the scheme for boroughs.

6. Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of the Equality Act 2010 and the regulations if applicable)

The new mobility assessment will ensure that those people with the most need receive a service from the Taxicard scheme. The two possible unmet needs that could be identified are:

- Where the individual, when assessed, does not evidence a high enough level of need to get a Taxicard or to get a higher trip limit. In this instance the individual can be signposted to any alternative statutory provision for assistance, thereby minimising any adverse impact. Moreover the introduction of the mobility assessment will provide an objective and transparent assessment of need, so when it is introduced the Council will be able to evidence that only people who have a genuine need at the right level are accessing the scheme
- Where the person has a regular transport need which means 48 trips per year will not be enough. The right to apply for a higher trip limit, which reflects your higher level of need, will ensure that where this need is genuine and cannot be met in other ways the Taxicard scheme has the flexibility to meet that need.

7. Have you consulted externally as part of your assessment? Who have you consulted with? What methods did you use? What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

There has been a 12 week consultation on the changes. There were:

- Four public consultation meetings held: 12th May, 26th May, 3rd June and 24th June. These meetings were attended by about 150 people in total. Each of these meetings followed the same format. A presentation which gave an overview of the consultation process (including the fact that the responses would be presented to Brent Council Executive at the end of the summer); why the changes are required and what Brent Council is proposing. This was followed by an open discussion with the all the points being recorded
- The proposed changes were also discussed at a number of existing forums including: the Pensioners Forum (6 June 2011) and the Brent Local Improvement Network (9 June 2011).
- The questionnaire, which was sent to everyone with a Taxicard with a pre-paid envelope, and was also available on the Brent website. 1007 paper responses were received and 48 online responses as well as a range of individual comments (this represents a response rate of 23%). The results for paper responses and the online version were broadly comparable.

8. Have you published the results of the consultation, if so where?

Yes, on the Brent Council website in the consultations section.

9. Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?

There has been media interest across London regarding the changes which were adopted in January 2011 to varying degrees across the 32 participating London Boroughs. There have also been some enquiries from the local MPs and individual representations about these changes and the subsequent consultation.

Most interest has been upon the impact of the changes implemented in January 2011. The issues of concern have since been addressed by this consultation and the propose changes to the policy, and there has not been any media interest in the consultation and the proposals set out in the consultation.

10. If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think about whether the proposed service/policy etc will have a positive or negative effect on the promotion of equality of opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.

The changes will make the Taxicard scheme more transparent and will clearly focus limited resources on those people with the greatest need. However, the fact that the Council needs to focus the resources on people with more need, means that there will be a negative impact on those people with lower needs, some of whom may well be benefiting from the Taxicard scheme at the moment. This is set out in more detail in section 4.

The increase in the minimum charge and the reduction in the maximum subsidy means that the scheme could be considered to be less affordable. Assuming all trips are taken (4 per month), that these trips are not longer than the distance covered by the maximum subsidy, this means that the increase in costs to the individual would be £4 per month. While this is not an insignificant amount to someone on a low income, it does need to be put in the context of the subsidy for the same trips, which equates to £37.20.

Therefore although the proposal may have some adverse financial impact for a limited number of users with lower needs, overall it will have a positive impact in terms of eliminating discrimination as it will ensure that those in the community with high needs due to disability will be able to continue to access the scheme which in turn will promote equality of opportunity for those with disabilities of all ages. Without the proposed changes the scheme would remain unattractive and unaffordable to members, because of the unavailability of double swiping.

11. If the impact cannot be justified, how do you intend to deal with it?

In discussing the changes to the Taxicard scheme in consultation with the public and within the context of the discrete and finite budget for the scheme, it is argued that the adverse impact for those with lower needs can be justified in terms of focusing the Taxicard scheme on those in the most need and in terms of balancing the contribution of the individual and the Borough.

12. What can be done to improve access to/take up of services?

There are 4546 members of the Taxicard scheme. It is a well publicised scheme across the participating

London Boroughs and well known to user groups and social care staff, who refer individuals to the scheme. The success and take up the scheme has in part been the cause of the increase in activity rates which generated the budget overspend.

13. What is the justification for taking these measures?

N/A

14. Please provide us with separate evidence of how you intend to monitor in the future. Please give the name of the person who will be responsible for this on the front page.

The management data from the London Councils will be reported back to Adult Social Care Departmental Management Team and the Director of Adult Social Care on a quarterly basis to ensure that the proposals made, if agreed by the Executive, are sustainable.

15. What are your recommendations based on the conclusions and comments of this assessment?

Should you:

1. Take any immediate action?

Implement the proposed changes if agreed by the Executive to ensure the scheme is focused on the people with the highest level of need.

2. Develop equality objectives and targets based on the conclusions?

Request from the London Councils activity data on the recorded user groups, age, gender, ethnicity and automatic or discretionary criteria for a more detailed break down of the Brent membership, and confirm whether the marketing of the scheme needs to change to reflect the current membership and the desired future membership.

3. Carry out further research?

Not applicable.

16. If equality objectives and targets need to be developed, please list them here.

Data is collated by the London Councils on behalf of Brent. An analysis of this data in both terms of user numbers and activity will enable the department to assess whether the service is impacting disproportionately on any of these groups.

17. What will your resource allocation for action comprise of?

The resources required for action are primarily focused on London Councils. However, management capacity and mobility assessment capacity will also be crucial to the successful implementation of the proposed changes.

If you need more space for any of your answers please continue on a separate sheet

Signed by the manager undertaking the assessment:

Full name (in capitals please):

Date:

Service Area and position in the council:

Details of others involved in the assessment - auditing team/peer review:

Once you have completed this form, please take a copy and send it to: **The Corporate Diversity Team, Room 5 Brent Town Hall, Forty Lane, Wembley, Middlesex HA9 9HD**