



Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Review of School Transport Policy

Key findings from this assessment (or reason why an EFSIA is not required):

The proposed revisions to the home to school transport policy updates eligibility criteria to reflect the availability of a safe walking route for certain pupils living within one mile of Lornhill Academy, particularly in the Ten Acres, Willowfields and Greenacres areas. The changes also seek to ensure fairer access to Privilege Passes by prioritising pupils in receipt of free school meals and care-experienced young people. The recommendations do not alter existing arrangements for pupils transitioning from St Mungo's or St Bernadette's to St Modan's High School, nor do they affect transport provisions for children with additional support needs.

Summary of actions taken because of this assessment:

As a result of reviewing the home to school transport policy, a public consultation on proposed changes to transport entitlement for pupils living within a safe walking distance of Lornhill Academy will take place. The proposed review will also lead to the introduction of a fairer system for allocating concessionary school transport passes, giving priority to pupils in receipt of free school meals and care-experienced young people. Additionally, the review confirmed that existing arrangements for pupils transitioning from St Mungo's and St Bernadette's to St Modan's High School should remain unchanged to support continuity with peers, and that no changes are required to ASN transport provisions. These actions ensure the policy reflects current local circumstances, supports equity, and continues to align with Council priorities.

Ongoing actions beyond implementation of the proposal include:

Lead person(s) for this assessment:

Judith Morrison, Improving Outcomes Engagement Officer

Senior officer approval of assessment:

Michael Boyle, Business Manager

DATE: 7 April, 2026

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The aim of the proposal is to review and update the Council's home-to-school transport policy to ensure it remains fair, consistent, and aligned with current local circumstances and legislative requirements. Specifically, the proposal seeks to consult on changes to transport entitlement for certain pupils in the Craigbank Primary School catchment who live close to a newly established safe walking route to Lornshill Academy. It also aims to introduce a more equitable system for allocating concessionary school passes by prioritising pupils in receipt of free school meals and care-experienced pupils. Additionally, the proposal intends to retain existing transport arrangements for pupils transitioning from St Mungo's and St Bernadette's to St Modan's High School to support continuity with peers. Overall, the purpose is to modernise the policy, reflect significant new housing developments, ensure equitable access to transport support, and uphold the Council's wider commitments to fairness and The Promise.

2. Why is the proposal required?

The proposal is required to modernise the home-to-school transport policy so that it reflects current local circumstances, including significant new housing developments in the Ten Acres, Willowfields and Greenacres areas, where pupils now have access to a safe walking route of less than one mile to Lornshill Academy. The existing policy, last reviewed in 2011, no longer aligns with national practice, as no other Scottish councils provide free transport for secondary pupils living under two miles from school where a safe walking route exists. The proposal is also needed to introduce a fairer system for allocating concessionary passes by prioritising pupils in receipt of free school meals and care-experienced pupils, and to confirm the continuation of existing arrangements supporting pupil transitions to St Modan's High School. These updates ensure the policy remains equitable, financially sustainable, and aligned with the Council's commitments.

3. Who is affected by the proposal?

The proposal affects secondary age pupils living in the Craigbank Primary School catchment area, particularly those in the Ten Acres, Willowfields and Greenacres developments who currently receive free transport but now have access to a safe walking route to Lornshill Academy. It also impacts pupils who apply for a concessionary pass as priority would be given to those in receipt of free school meals and care-experienced young people. In addition, pupils transitioning from St Mungo's and St Bernadette's to St Modan's High School are affected through the continuation of existing transport arrangements, while pupils with additional support needs are unaffected as their bespoke transport provision remains unchanged. Parents, carers, and school transport services may also experience operational impacts from the proposed changes.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

Home to School Transport Policy (2011 review / 2004 framework)
The Promise
Transport provision for pupils with Additional Support Needs

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

Yes

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- help you to understand the importance of your proposal for those from equality groups,
- inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and
- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group Socio economic disadvantage (if required)	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age		The evidence indicates that secondary-age pupils affected by the proposed changes generally have access to a safe, lit walking route to Lornshill Academy, with those living in the Ten Acres, Willowfields and Greenacres developments being less than one mile from school. This suggests that, for many in this age group, independent and active travel is both feasible and appropriate within national expectations for pupils living under two miles from their secondary school where safe walking routes exist. The Council also recognises that some pupils particularly those in receipt of free school meals or with care

Equality Group Socio economic disadvantage (if required)	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		experience, face greater barriers to participation, which is why prioritisation for concessionary school transport passes is proposed to reduce inequality within this age group. Importantly, no negative impacts are anticipated for pupils transitioning from St Mungo's and St Bernadette's, whose existing transport arrangements will remain in place to support stable peer transitions. The report also confirms that children with additional support needs will experience no change, as their bespoke transport arrangements continue unaffected. .
Disability		The evidence shows that pupils with disabilities or additional support needs will not experience any negative impact from the proposed changes to the home-to-school transport policy. The report explicitly states that transport for children with additional support needs is provided in a bespoke way tailored to their individual needs, and that no changes are proposed to this arrangement. This means their existing, needs led transport support continues unchanged, ensuring that the proposal does not reduce accessibility, increase travel burdens, or disrupt established routines for disabled learners.
Race		No specific impacts are identified in the available evidence
Sex		No specific impacts are identified in the available evidence
Gender Reassignment		No specific impacts are identified in the available evidence
Sexual orientation		No specific impacts are identified in the available evidence
Religion or Belief		The evidence indicates that pupils whose school choices are influenced by religion or belief specifically Roman Catholic pupils transferring from St Bernadette's and St Mungo's Primary Schools to St Modan's High School will not experience any negative impact as a result of the proposal. The report explicitly states that their existing entitlement to free home-to-school transport will remain unchanged, ensuring they can continue to transition with their peers who share the same faith-based educational pathway. This consistency avoids creating inequity between pupils attending St Modan's via placing request and protects the continuity and stability valued by families choosing denominational education.

Equality Group Socio economic disadvantage (if required)	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Pregnancy or maternity		No specific impacts are identified in the available evidence
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)		No specific impacts are identified in the available evidence
Socio economic disadvantage (if required)		The evidence indicates that the proposal is likely to have a positive impact on pupils experiencing socio-economic disadvantage. The report recommends that applications for concessionary school transport passes should be prioritised for pupils in receipt of free school meals and care-experienced young people, recognising that these groups often face greater financial and social barriers to accessing education. This shift away from a first-come, first-served system ensures that limited transport capacity is allocated more equitably to those with the greatest need. Additionally, pupils in new housing developments near Lornshill Academy who would lose automatic entitlement based on proximity are predominantly within walking distance and therefore not expected to incur additional costs. No evidence suggests that the proposal introduces new financial burdens for low-income families, and the prioritisation measure directly supports the Council's fairness commitment.

7. Based on the evidence above, is there relevance to some or all of the equality groups? Y/ N/ unclear – Yes

If yes or unclear, proceed to further steps and complete full EFSIA

If no, explain why below and then proceed to Step E:

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:

Consultation will be undertaken with relevant community stakeholders to fully understand the proposal's impact on affected groups. In line with Article 12 of the UNCRC (Incorporation) (Scotland) Act 2024, the consultation process will ensure that children and young people are provided with meaningful opportunities to express their views on matters that may affect them. Engagement with pupils directly impacted by the proposed changes will therefore form a central part of the consultation, and their views will play a key role in shaping and informing the final policy recommendations presented to Council.

9. Please detail the outcome of any further engagement, consultation and/or research carried out:

As part of the engagement process for the proposed Transport Review, focus groups will be convened with children and young people to gather their views.

These groups will consist of pupils from Craigbank Primary School and Lornshill Academy.

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			Ensure clear communication in accessible formats, provide appropriate support for younger and older service users where needed, and record rationale where no changes are required to demonstrate that decisions have been made fairly and transparently.
potential for developing good relations				
potential to advance equality of opportunity				

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				There is no evidence of disproportionate impact on individuals from racial minority backgrounds in this area.
potential for developing good relations				
potential to advance equality of opportunity				

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations	X			
potential to advance equality of opportunity	X			

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			
potential for developing good relations				
potential to advance equality of opportunity				

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)	X			

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?	X			

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
X	No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
	Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.
	Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.
	Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment.**
Record details of these discussions and decisions taken below:

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. **Record any post-implementation actions required.**

Ongoing monitoring to ensure the changes are working as intended and have no unintended negative impacts. Review feedback from staff/service users after the implementation period and make adjustments

if necessary. Update relevant documentation, processes, or guidance based on what is learned during implementation.

15. **Note here how you intend to monitor the impact of this proposal on equality groups.**
16. **Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:**

Step G – Assessment sign off and approval

Lead person(s) for this assessment:

Signed: Judith Morrison

Date: 7 April, 2026

Senior officer approval of assessment:

Signed: Michael Boyle

Date: 7 April, 2026

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.