

Customer Access Review – Full Assessment

Assessment details		
Assessment area	Parking Services	
Date of assessment	10/02/2017	
Directorate and Service	Enforcement & Regulatory Services	
Manager	Enforcement and Regulatory Services Manager	
Officer conducting assessment	Transport Services Manager	
Step 1: Scoping the assessment		
1	What are the aims and objectives of the activity or proposal?	<p>Overall purpose is to provide an effective on-street and off-street parking service that ensures a reduction in traffic congestion, pollution and hazards to all highway users including pedestrians and cyclists.</p> <p>CEOs</p> <ul style="list-style-type: none"> To patrol the borough’s kerb-space management regulations ensuring drivers comply with them so other highway users are not delayed or inconvenienced unnecessarily. To advise on where and how to park in accordance with regulations. To offer advice in the form of local knowledge. To collect intelligence to assist local businesses and residents in the prevention of crime. <p>NPOs</p> <ul style="list-style-type: none"> To process Penalty Charge Notices (PCNs) in accordance with legislation and statutory guidance including responding appropriately to challenges and representations and preparing cases for appeals to the Traffic Penalty Tribunal. To process applications for permits, exemptions, disabled persons parking bays, vehicle access markings and dispensations. To advise residents, councillors, officers, other agencies and contractors on general issues regarding parking management.
2	Who will be affected?	<p>The general public who choose to park in contravention of highway law or the regulations managing the Council’s car parks; especially applicable to Driving Licence and Blue Badge holders.</p> <p>Applicants for, and holders of, resident parking permits, resident exemptions,</p>

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		<p>dispensations and applicants for disabled persons parking bays and vehicle access markings.</p> <p>Residents in communication with the service regarding enforcement of existing traffic regulation orders or proposals for new ones.</p>
<p style="text-align: center;">3</p>	<p>How does the activity or proposal contribute to:</p> <p>a) any key performance indicators?</p> <p>b) policies, values or objectives of Dartford Borough Council?</p>	<p>a) N/A.</p> <p>b) Civil Parking Enforcement meets the Corporate Plan 2014-17 Strategic Aim to ‘provide high quality services that reflect public aspirations and demonstrate improvement’ and the Strategic Objective of ‘delivering high quality services, offering value for money and demonstrating customer satisfaction and a culture of continuous improvement’.</p>
<p style="text-align: center;">4</p>	<p>Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p>All aspects of Civil Parking Enforcement are delivered in accordance with legislation, including but not limited to:</p> <ul style="list-style-type: none"> • Road Traffic Regulation Act 1984; • Traffic Management Act 2004; • Statutory Instrument 3482: The Civil Enforcement of Parking Contraventions (England) Representations and Appeals Regulations 2007; • Statutory Instrument 3483: The Civil Enforcement of Parking Contraventions (England) General Regulations 2007; • Statutory Instrument 3484: The Removal and Disposal of Vehicles (England) Regulations 2007; • Statutory Instrument 3485: The Civil Enforcement Officers (Wearing of Uniforms) (England) Regulations 2007; • Statutory Instrument 3486: The Civil Enforcement of Parking Contraventions (Approved Devices) (England) Order 2007; and • Statutory Instrument 3487: The Civil Enforcement of Parking Contraventions (Guidelines on Levels of Charges) (England) Order 2007. <p>Discretion opportunity exists in the interface of the CEOs speaking with members of the public who have parked illegally (intentionally or accidentally). This does not include in the issuing of a ‘Penalty Charge Notice’ (parking fine); vehicles observed in contravention of regulations must be served with a parking fine although the drivers of ‘attended vehicles’ parked in contravention of ‘No waiting’ regulations are given the opportunity to move on.</p>

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		<p>There is also opportunity for exercise of discretion when dealing with challenges and representations from recipients of PCNs. The Council, in partnership with others in Kent and Medway, developed and operates cancellation guidance to ensure as far as possible, the fair and reasonable considerations in the exercise of discretion across the County; however, each ‘appeal’ is considered on its own circumstances with consideration to the cancellation guidance. NPOs may refer considerations to the NPO Supervisor who in turn may refer to the Transport Services Manager and Strategic Director (external services).</p> <p>CEOs receive training to NVQ Level II and NPOs receive training to NVQ Level III which includes equality and diversity elements as well as ‘managing conflict’ situations. Additionally, CEOs wear ‘body-worn cameras’ and the telephone calls to NPOs are recorded so any reported issues can be considered following a review of the camera footage or telephone call recording.</p>
Step 2: Information collection		
Note: Equality and Diversity information for Dartford can be found at http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data		
5	<p>What do you know about the groups of people who will be affected? i.e. demographic information in relation to the protected characteristic groups (age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment)</p>	<ul style="list-style-type: none"> • Dartford’s population is approximately 102,000. • 51% females and 49% males. • People aged 30-34 make up the highest proportion of the population at 7.7%. • The 85 plus age group make up the smallest proportion at 1.3%. • 88% of Dartford’s population is white and 12% are from a BME community. • At the time of the 2011 Census 15.1% of the total population of Dartford considered themselves to have a health problem or disability which limited their day-to-day activity. <p>Whilst the Parking Services team does not collect information related to the protected characteristic groups, the Contact Centre collects, name, full address, contact details and the enquiry details of the customer who is accessing the Parking Services team.</p>
6	<p>What consultation has taken place with affected groups? Please describe who was consulted and the key findings.</p>	<p>No consultation has taken place with the drivers who have parked in contravention of highway and parking management regulations. However, residents are periodically consulted about parking management regulations although equality and diversity information is no longer collected as part of consultations. Equality and diversity information used to be requested as part of the survey form, but many</p>

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		residents took objection to this and challenged the relevance of it to parking management. Parking management is a highly emotive subject for many and the equality and diversity information appeared to stimulate passions further and so it was removed from the survey form.
7	Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	<p>With reference to 6 above; there is no equality and diversity information available and nor is it considered relevant for parking enforcement because the majority of PCNs are served to vehicles and not people.</p> <p>Civil Parking Enforcement does not engage with members of the community in a way that will allow the collection of data required by equality and diversity monitoring. The starting point for the Council’s Parking Services is with vehicles left in contravention of highway regulations and contact with drivers is minimal.</p>

Step 3: Assessing the equality impact

8	<p>Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the General Equality Duty:</p> <p>a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the ‘No Impact’ box and explain why in question 9 • If the equality impact is unclear, please tick the ‘Unknown’ box and explain why in question 9
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		POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
a	Age	Regulation compliance which includes informal and formal pedestrian crossing areas assists road safety objectives for all ages. Targeted patrolling of regulations outside schools endeavours to create a safe environment for children and young people around schools.	-	<input type="checkbox"/>	<input type="checkbox"/>

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b	Disability	<p>Regulation compliance includes informal and formal pedestrian crossing areas and regulations assisting mobility for all traffic and pedestrian movement. Regulations make provision for Blue Badge holders under the Government's Blue Badge Scheme.</p> <p>CEOs reduce the levels of abuse of Disabled Persons Parking Bays by those who are not Blue Badge holders.</p>	-	<input type="checkbox"/>	<input type="checkbox"/>
c	Gender (including reassignment)	<p>All residents benefit from a parking service that ensures a reduction in traffic congestion, pollution and hazards to all highway users including pedestrians and cyclists.</p>	-	<input type="checkbox"/>	<input type="checkbox"/>
d	Race	<p>All residents benefit from a parking service that ensures a reduction in traffic congestion, pollution and hazards to all highway users including pedestrians and cyclists.</p>	<p>Non-English speaking drivers may not understand some signing; however, it is the responsibility of drivers to know the rules of the highway in the country they visit. (The lines and signs managing parking practices in the Borough are compliant with the national legislation for Traffic Signs Regulations and General Directions).</p>	<input type="checkbox"/>	<input type="checkbox"/>
e	Religion/Belief	<p>All residents benefit from a parking service that ensures a reduction in traffic congestion, pollution and hazards to all highway users including pedestrians and cyclists.</p>	-	<input type="checkbox"/>	<input type="checkbox"/>
f	Sexual Orientation	<p>All residents benefit from a parking service that ensures a reduction in traffic congestion, pollution and hazards to all highway users including pedestrians and cyclists.</p>	-	<input type="checkbox"/>	<input type="checkbox"/>

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g	Pregnancy/Maternity	Regulation compliance includes informal and formal pedestrian crossing areas and regulations assisting mobility for all traffic and pedestrian movement.	-	<input type="checkbox"/>	<input type="checkbox"/>
9	If 'no impact' or 'unknown' was selected, please explain	The service deals predominantly with vehicles left in contravention of regulations and occasionally the drivers of those vehicles. The issuing of PCNs is offender specific. Anyone may hold a Driving Licence should they pass the necessary tests which includes knowledge building of highway law and recognising nationally prescribed regulations. Whilst many drivers park their cars in accordance with the regulations, a section do not and it is that section of the community that engages with the Council's Parking Services officers. Some of that contact is in conflict and therefore there is no opportunity to collect information beyond that of the evidence proving either the contravention did or did not take place.			
10	If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	The last part of the statutory process is the registering of a Road Traffic Debt and the issuing of a Warrant of Control to an Enforcement Agent (bailiff). Parking Services work with two of the companies the Council uses for debt collection by other Council services. The Service Level Agreement incorporates requirements around equality and diversity and procedures for when vulnerable persons are identified. Additionally, Enforcement Agents employ body-worn cameras so the footage can be reviewed should incidents be reported.			
11	Any other comments	The visual uniformed presence of CEOs may enhance community safety as their presence can reduce the fear of crime for some vulnerable groups.			

Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

- a) any gaps in information and consultation
- b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None identified.	N/A	N/A	N/A	N/A	Transport Services Manager

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b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?					
Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None identified.	N/A	N/A	N/A	N/A	Transport Services Manager
Step 5: Decision making and future monitoring					
13	Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?		CSU Manager, Enforcement and Regulatory Services		
14	How will you continue to monitor the impact of the activity or proposal on the equality groups?		N/A		
15	When will you review this Customer Access Review?		January 2020		
Step 6: Final steps					
16	Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer				
17	If the subject of the Customer Access Review is going to committee, summarise your findings in the committee report				
18	Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded				