

Equality Impact Assessment Form (EIA)

Proposed Project Title: Removal of pay and display machines

Date: September 2022

Stage 1 – screening to establish if the function has any relevance to any equality issue and/or monitored group, i.e.

- Could the function affect one or more equality group in a different way to another group?
- Establish whether different equality groups have different needs
- Establish whether the function contributes to or hinders equality of opportunity

1a	<p>It was agreed in November 2019, report number ES19066, that delegated authority would be given to the Director of Environment & Public Protection for the removal of P&D machines across the Borough in consultation with the Portfolio Holder. Since this time, the Council have had 2 rounds of pay and display machine removals.</p> <p>The reduction of on-street pay and display machines across the borough will:</p> <ul style="list-style-type: none"> • modernise the service • reduce environmental clutter • reduce the cost associated with the number of cash collections made on behalf of the borough • reduce the carbon footprint associated with the collections • minimise the financial cost associated with repair and replacement due to vandalisms and general wear and tear 		
1b	<p>How would you classify the function type?</p> <p>The service is open to all go to question 1d</p>		
1c	<p>Is the function accessible for all groups? Either tick the box 'Accessible to all groups' and provide <u>relevant evidence</u> OR tick the box for each group to whom the function is <u>not accessible</u> or for whom there may be needs or considerations to accommodate.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none; vertical-align: top; padding: 5px;"> <input type="checkbox"/> Accessible for all groups <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Disability <input type="checkbox"/> Gender reassignment <input type="checkbox"/> Marriage & civil partnership </td> <td style="width: 50%; border: none; vertical-align: top; padding: 5px;"> <input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Sex <input type="checkbox"/> Sexual orientation </td> </tr> </table>	<input type="checkbox"/> Accessible for all groups <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Disability <input type="checkbox"/> Gender reassignment <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Sex <input type="checkbox"/> Sexual orientation
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1d	<p>Is it likely that there will be a negative impact on one or more of the equality groups, or is it clear at this stage that it will be equality neutral? (No negative impact on the groups) Please tick in the box equality neutral OR tick the box for the group(s) that will suffer a negative impact. If you have ticked the box 'equality neutral' please provide evidence.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none; vertical-align: top; padding: 5px;"> Equality neutral <input checked="" type="checkbox"/> Age </td> <td style="width: 50%; border: none; vertical-align: top; padding: 5px;"> <input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race </td> </tr> </table>	Equality neutral <input checked="" type="checkbox"/> Age	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race
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<input checked="" type="checkbox"/> Disability <input type="checkbox"/> Gender reassignment <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Religion & belief <input type="checkbox"/> Sex <input type="checkbox"/> Sexual orientation
If you consider that the impact is Equality Neutral then go to question 1h Otherwise go to question 1e	

1e	<p>What are the negative impacts associated with this function? Please list and give details then go to question 1f</p> <p>The main negative impacts associated with the removal of pay and display machines are detailed below:</p> <ul style="list-style-type: none"> • Motorists may not be able to access the service if they do not own a mobile phone • Service users who do not have a bank account or own a credit or debit card will be unable to use the online payment service.
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1f	<p>Are there positive impacts associated with this function? If yes, please list and give details.</p> <p>There are several positive impacts associated with the proposal including:</p> <ul style="list-style-type: none"> • An opportunity to provide a modern more reliable service for customers than the existing pay and display machines that are getting old and are prone to theft and vandalism • The cashless system allows for the customer to renew their parking session remotely which significantly reduces the risk of receiving a Penalty Charge Notice (PCN). • Standardised approach with other London Boroughs who have already introduced this system including boroughs with the highest Indices of Multiple deprivation (IMD) scores, including Newham, Lambeth and Tower Hamlets. • The new system is COVID secure reducing the risks associated with handling coins and notes and touching machines which are not cleaned after use. • Environmental benefits include reducing the carbon footprint associated with the cash collections and maintenance runs.
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1g	<p>At this stage, what plans could be built in to address any negative impacts, and/or to add measures which promote a positive impact, or could you consider an alternative approach which may better achieve the promotion of equality?</p> <p>Plans to reduce the negative impacts associated with introducing cashless payments include:</p> <ul style="list-style-type: none"> • Any motorist who holds a disabled Blue Badge is entitled to free parking in Council operated car parks and on-street paid for parking bays and this will continue unchanged. • Market testing - there have been two successful campaigns in 2020 and 2022 to reduce the number of pay and display machines. <p>Public Information Campaign</p> <ul style="list-style-type: none"> • The removal of Pay and Display equipment will be advertised three months in advance so that customers have the chance to fully understand the cashless system before the machines are removed. The high number of London boroughs using the cashless system means that many service users will already be familiar with it.
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	<ul style="list-style-type: none"> • Further information will be available on the website and extra support can be given to those who need assistance with the cashless service. • Digital marketing assets will be displayed on the Borough’s JC Decaux boards to extend the reach of the service change. • Leaflets will be provided to libraries, community resource centres, churches, GP surgeries and antenatal clinics to maximise awareness amongst groups with protected characteristics.
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1h	<p>The Council has a responsibility to promote positive attitudes to equal opportunities in public life. Has this responsibility been discharged in the application of this function? If yes give examples.</p> <p>This proposal fully supports the responsibility to promote positive attitudes to equal opportunities in public life. It fully considers the needs of all the equalities groups currently using or wishing to use parking services within the Borough, examples are detailed below.</p> <p>The Council’s Equality policy is published on the website and sets out how we are proactively working to make the community a welcoming place where everyone feels they belong. https://www.bromley.gov.uk/equality-diversity/equality-policy</p> <p>We make sure that the needs of the those with protected characteristics are fully considered when making decisions. We evidence our thinking which supports the delivery of our Building a Better Bromley priorities. This process has been followed in relation to the removal of pay and display machines.</p>
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1i	<p>Are there any Human Rights Issues? If so, what are they?</p> <p>The implications of this proposal have been assessed using the flow chart in ‘Human Rights: Human Lives. A Guide to the Human Rights Act for Public Authorities’, Equality and Human Rights Commission. This proposal does not interfere with human rights.</p>
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1j	<p>Is a full impact assessment required?</p> <p><input checked="" type="checkbox"/> Yes</p>
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Stage 2 – full impact assessment

2a	Does the function affect or impact on the public, whether directly or indirectly?		
	<input checked="" type="checkbox"/> YES directly.		<input type="checkbox"/>

Provide any relevant information here.			
This change will remove the facility to pay for parking with cash. Card payments can only be made using a mobile phone.			

2b	Have complaints or feedback been received about the function and its effect on different equality groups?		
	<input type="checkbox"/>	<input checked="" type="checkbox"/> no	<input type="checkbox"/>

Two rounds of pay and display machine removals have previously been carried out, one before the Covid pandemic and one after. The Council has received no formal complaints against either of these removal processes and there has been no drop off in usage at the specific locations.			
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	Officers have found that pay and display machine usage has decreased since the covid pandemic, as more people have got used to using alternative technology to pay for goods/parking including other frontline services provided by the Council.			
2c	Outsourced services - if the function is provided by external organisations/agencies on behalf of the Council please detail any arrangements you have to ensure that the function promotes equality; this may include contract conditions.			
	Provide evidence by documenting all reliable up to date information. This part of the service is contracted out to APCOA Parking (UK) Ltd as part of the Parking Enforcement Contract.			
2d	Does the function have employment implications for Council staff			
	<table style="width: 100%; border: none;"> <tr> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;">no</td> <td style="border: none;"><input type="checkbox"/></td> </tr> </table>	<input type="checkbox"/>	no	<input type="checkbox"/>
<input type="checkbox"/>	no	<input type="checkbox"/>		
	No. There will be no impact to the Council's staffing.			

2e	<p>If you have established that the function does have an adverse impact on one or more of the groups, then you must identify whether this is justifiable. If not, then the function must be changed. Please set out the adverse impact and the business justification for continuing with this situation.</p> <p>The primary justification for making the proposed changes to remove the pay and display machines is to make services more efficient for customers and to bring Bromley in line with other Councils.</p> <p>This process has highlighted that there could be an impact on two groups which include age and disability relating to availability of phone and payment card. The impact on the identified affected groups has been considered and fully mitigated as set out below</p> <p>Barriers to use mobile phones and card payment</p> <p>Phones: In 2022, an estimated 93% of the UK population own a smartphone. The over 55s are reported as the age group with lowest ownership, but at 82%, the figure still remains high following a rapid increase over the last 5 years. Source: https://www.statista.com/statistics/271851/smartphone-owners-in-the-united-kingdom-uk-by-age/</p> <p>The use of technology amongst all age groups grew visibly during the pandemic during periods of lockdown with older people using technology including phones to shop online and FaceTime/Zoom calls with family and friends.</p> <p>As an alternative to those who do not have a mobile phone, parking sessions can be booked online before they park, although this cannot guarantee a parking space.</p> <p>Card payments: As of July 2022, 150 million credit and debit cards were recorded as being in circulation in the UK – over double the population of the UK.” Source: https://www.ukfinance.org.uk/system/files/2022-0/Card%20Spending%20Update%20-%20July%202022.pdf</p> <p>Reliable data on the number of residents and visitors to Bromley who do not hold a bank account is not available. Research by Transport for London suggests around 1% of residents in London do not hold a bank account.</p>
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	<p>Access to a transactional bank account is seen by national Government as crucial. Payment Accounts Regulations 2015 legislate that the nine biggest current account providers in the UK must offer basic bank accounts free to anyone, including those who cannot open a standard current account because they are ineligible or people who don't use banks.</p> <p>The impact concerns only those members of the community who drive a vehicle and do not have a bank account, not the population as a whole. It seems highly unlikely for the reasons below that the number of people locally owning or operating a vehicle without access to a bank account would be significant.</p> <p>In order to operate a vehicle, the driver must seek and retain an MOT, VED certificate and insurance. In many cases, further administrative tasks such as paying for levies including Congestion Zones or Ultra Low Emission Zones.</p> <p>A further consideration for the wider community is the administration of benefits and credits. In almost all cases, a basic bank account is required for payments to be made, in addition to the ease of administration, accounts also act as a proof of identity and a mitigation against fraud.</p> <p>Disability: A further mitigation factor is that those with disabilities who hold a Blue Badge will be unaffected by the service change.</p> <p>Those eligible for the Mobility car scheme are likely to have a bank account as this is usually the way they receive their allowances.</p> <p>There were no adverse impacts identified for the remaining equalities groups - the public information campaign will be targeted at all equalities groups including other languages.</p>				
2f	<p>Monitoring – give details of any monitoring being carried out on existing functions.</p> <p>Please see Appendix 1 of the Committee Report dated 22nd November 2022 for usage statistics for the on and off-street parking locations around the Borough. The cashless system has been in place since 2010 and is a reliable service that has minimal downtime.</p>				
2f (i)	<p>If this is a new function, or not currently monitored, are you planning to monitor the impact of the function</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input type="checkbox"/> yes</td> <td style="width: 33%; text-align: center;"><input checked="" type="checkbox"/> no</td> <td style="width: 33%; text-align: center;"><input type="checkbox"/> Don't know</td> </tr> </table> <p>If yes add details to action plan</p> <p>If no please explain why it is not considered appropriate to do so.</p> <p>Please see the Agenda for Environment and Community Services Policy Development and Scrutiny Committee on Tuesday 22 November 2022 at 7pm item 13h (Review of Parking Fees and Charging Processes) Appendix 1 for the usage statistics and Appendix 2 for information on other London Boroughs' cashless experiences.</p>		<input type="checkbox"/> yes	<input checked="" type="checkbox"/> no	<input type="checkbox"/> Don't know
<input type="checkbox"/> yes	<input checked="" type="checkbox"/> no	<input type="checkbox"/> Don't know			
2g	<p>Consultation – If you have not carried out consultation, or if you need to carry out further consultation who will you be consulting with and by what methods?</p> <p>Once approved, a Notice of Variation will be advertised at all Council operated parking locations and in local press informing the public of the changes that will take place and relevant dates. Details of the public information campaign are set out in section 1g.</p>				
2h	<p>Evidence – what further evidence do you have about considerations with regard to equality issues that you have made concerning this function? e.g. audit reports, minutes from meetings or survey results</p>				

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	<p>The Council has already undertaken two rounds of pay and display machine removals making approximately 30 locations cashless only parking. On completion of these machine removals, no formal complaints were received and there was no drop off in usage at the specific locations.</p> <p>Please see the Agenda for Environment and Community Services Policy Development and Scrutiny Committee on Tuesday 22 November 2022 at 7pm item 13h (Review of Parking Fees and Charging Processes).</p>
2i	<p>Publishing – if the equality impact assessment forms part of an overall review then the results should be published as part of any report that goes forward to Elected Members. If not the findings of the impact assessment should be published on our Council’s web site.</p> <p>See Generic Equality Impact Assessment Action Plan in Stage 3 (below)</p>
2j	<p>Training and development - please list any staff training issues that have arisen as a result of conducting the impact assessment.</p> <p>See Generic Equality Impact Assessment Action Plan in Stage 3 (below)</p>

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Stage 3 - GENERIC EQUALITY IMPACT ASSESSMENT ACTION PLAN please list actions that you plan to take as a result of this assessment, continuing on a separate sheet if necessary. If appropriate these actions should be added to any business/service plan for the function.

Issue	Action to be undertaken	Desired outcome	Action owner	Target date
Follow the statutory regulations for proper notification of change	Place Public Notices at all prominent locations affected by the proposal as required by the statutory regulations	Compliance with the regulations and proper processes	Traffic Services	January – April 23
Follow the statutory regulations for proper notification of change	Advertise the proposals online and in local news articles as required by the statutory regulations	Compliance with the regulations and proper processes	Traffic Services	January – April 23
Public objections to proposals	Report to relevant Cabinet member / Committee chairperson any objections received	No objections = no requirement for a follow up objection report	Head of Shared Parking Service (Bromley and Bexley)	November 2022
Web pages to be updated	Accurate information to be provided through the web pages to ensure that the public are aware of the on-street changes once made	All web pages to be updated	Head of Shared Parking Service (Bromley and Bexley)	January – April 23

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Public Communication Plan <ul style="list-style-type: none">• JC Decaux boards• Leaflet design and distribution• Posters	Communications plans to be designed and shared around the borough.	Public awareness of the removal of the pay and display machines before the scheme's implementation.	Head of Shared Parking Services (Bromley and Bexley)	January – April 23
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Signed:



Date: 15th November 2022