

## Appendix 5 - Equality Assessment Record



Title of Service, Policy, Procedure, Spending Review being Proposed	Adoption of cashless payments option and operational procedures for recreation road south car park and Churchfields multi-storey car park
Name of Service Area	Environmental and Housing Property Services
Name of Officer completing this assessment	Emily Payne, Engagement and Equalities Advisor Pete Liddington, Engineering Team Leader Matthew Mead, Senior Engineering Technician
Date Assessment Started	6/5/2021
Name of Decision Maker (in relation to the change)	Bromsgrove District Council Cabinet
Date Decision Made	TBC

### Please ensure the following:

- That the document is understandable to a reader who has not read any other documents and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete.
- That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

### Overview

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will the current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

Bromsgrove District Council are reviewing the current payment options in their Pay and Display car parks. The implementation of a Cashless Payment System (CPS) option for all 'Pay & Display' car parks is considered an important necessary step forward, particularly as these facilities provides the Authority with a significant amount of income. In a society where people increasingly do not carry cash and the recent Covid-19 restrictions, the ability to pay for parking by a mobile phone app or direct with a credit/debit card will ensure that we are providing modern payment facilities for users of Council car parks. We believe existing users' needs will still be met as we already have 20% of our transaction made by the Parking App Mi Permit. This

service is available via the app or telephone. It is proposed that the current coin only machines are replaced with debit/credit card machines which will also accept contactless transactions.

Who is the proposal likely to affect?	Yes	No
All residents	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Specific group(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
All Council employees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Specific group(s) of employees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other – Provide more details below	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Details

Outline who could be affected and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

The proposals are –

- 1) A Cashless Payment System (CPS) option be adopted for all Pay & Display car parks within the District, to be operational as soon as possible. Every car park, except Churchfields Multi-storey Car Park, will retain one ticket machine which will accept cash payments.
- 2) A 'Pay & Display' system be installed in Recreation Road South Car Park, with CPS option, to replace the current outdated and failing 'Pay on Foot' system, again to be operational as soon as possible.
- 3) Churchfields Multi-storey Car Park be used as a long stay car park only. This will be accessible by a Virtual Permit or Parking app only, with no cash payment being acceptable.

These changes would affect any user of Council Pay and Display car parks. There are likely to be some people for whom the existing payment machines are currently considered inaccessible, either in distance or in operation. A cashless alternative may be particularly beneficial for this group of users.

Although it is recognised that removing the option of cash could adversely affect certain groups, like older people, who may not have a smart mobile phone or access to the internet or ability to set up an online account. The Ofcom 'Adult's media use and attitudes report 2018' indicates that 78% of 65–74-year-olds use a mobile phone with 72% of the over 74's. Whilst only 39% of the over 65's uses a smartphone (up from 28% in 2016) it should be remembered that payments can be made via a phone call. A smartphone is not an essential requirement for using this service.

A bank account is an essential requirement for using the service. We believe it could negatively affect is a small group without access to a bank account who pay everything by cash, but this group is very small now at most 2% of the population

However, it should be noted that the UK government has helped launch fee-free bank accounts for people on low incomes, including the elderly. Most wages and state benefits are now paid directly into recipients' bank accounts which makes living without one and being able to run a vehicle most unlikely. Parking machines will still be available for card payments under the

phased scheme and most car owners pay insurance through bank accounts. For those with mobility issues or consider the pay machines difficult to access or use, phone payments can be made easier and safer from the comfort and convenience of a vehicle.

## **Evidence and data used to inform your equality impact assessment**

What data, research, or trend analysis have you used? Describe how you have got your information and what it tells you.

We have looked at what other local authorities have done including Stratford-on-Avon District Council that have converted to a total use of a CPS.

One of the UK's largest hearing loss charities 'Action on Hearing Loss' states the following: -

"The increasing availability of smartphone apps for parking payments has been beneficial and helps to avoid situations where people with hearing loss are disadvantaged by not being able to make use of voice call payment systems"

The themes around parking comments received in the 2020 Bromsgrove Community Survey include the need to update parking machines to include other payment methods, payment should be when you leave, payment by card as an option.

## **Engagement and Consultation**

What engagement and consultation have you undertaken about the proposal with current service users, potential users and other stakeholders? What is important to them regarding the current service? How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)? Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

To assess car park users' views, a comprehensive survey was undertaken. The survey opened on 7 October 2021 for 4 weeks closing on 12 November 2021. There was a total of 554 responses and the survey was promoted on social media, the councils website and in the local newspaper. The survey was online and paper copies were available at Parkside.

In general terms, the results indicate that most car park users, have no objection to the introduction of a CPS, but there are still many users who would wish to see a cash payment facility being retained.

The results were shared with Senior Managers, and it was suggested whether certain car parks had only the CPS system. However, as feedback from across the district shows, people want to still have cash as an option. It is recommended that the retainment of one cash payment ticket machine in every car park, except Churchfields Multi-storey, is now proposed and should produce a satisfactory solution.

It is envisaged that over time, as the public relies less on cash transactions, a full CPS will be more acceptable to users, but further consultation would be carried out and equality impacts consider. A summary of all the results accompany the report to Members.

Once the final decision has been agreed, a press release, social media, and poster campaign at key locations like the Council Office and library and in car parks, will take place to inform car park users about all the payment options available to them at each carpark.

## Public Sector Equality Duty

Due regard must be given to the three aims of the Equality Duty. This means that you must consciously think about the three aims as part of the process of decision-making. Consider the current service and any proposed changes, thinking about what issues may arise.

Equality Duty Aims	Evidence
<p><b>Eliminate unlawful discrimination, harassment and victimisation</b> How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic</p>	<p>We are aiming to make parking easier to access for all groups by providing a range of payment options. Following the consultation, the recommendation is now to keep a cash payment option at one machine in each car park, except the Churchfields Multi-storey.</p>
<p><b>Advance equality of opportunity between different groups</b> How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).</p>	<p>N/A</p>
<p><b>Foster good relations between different groups</b> Does the service contribute to good relations or to broader community</p>	<p>N/A</p>

cohesion objectives? How does it achieve this aim?	
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**Is there evidence of actual or potential unfairness for the following equality groups?**

- Does the proposal target or exclude a specific equality group or community?
  - Does it affect some equality groups or communities differently and can this be justified?
  - Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)

**Impact of proposal**

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

**If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?**

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

Protected Group	Impact of proposal	Justification for any actual or potential unfairness identified	If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?
Age	No bank account No Smartphone		Following the consultation where many expressed maintaining a cash payment option, the proposal is to have one machine in every carpark, except Churchfields multi-storey, accepting cash. By keeping this option, the council is listening to public view, ensuring accessibility, and has meant we have eliminated the actual or potential unfairness this change could have had for some customers.
Disability	No bank account No Smartphone Difficulty using phone booking		
Transgender	none		
Marriage and Civil Partnership	none		

Pregnancy and Maternity	Would negate the need for pregnant women and those with small children, to locate and walk to a payment machine with cash or a bank card and enable payment top-ups without the need to return to the vehicle		
Race	none		
Religion or Belief	none		
Sex (Male/ Female)	none		
Sexual Orientation	none		

**How will you monitor any changes identified?**

By regularly monitoring the use of all payment methods, feedback, and any complaints the impact of the change will be assessed.

**The actions required to address these findings are set out below.**

Action Required	By Whom	By When	Completion Date
Regularly monitor the use of all payment methods, feedback, and any complaints	TBC	TBC	TBC

Sign off on completion	Name	Signature	Date
Lead Officer completing assessment	Pete Liddington	P.Liddington	01.12.2021
Equalities Officer	Emily Payne	E.Payne	01.12.2021

**When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.**