



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Watford Borough Council – parking contracts
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Person completing the EIA	Justin Bloomfield
Type of policy, function or service:	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
Version & Date	Version 1 - 01/11/2017

1. Background

Watford Borough Council's parking service is a high profile front facing public service that directly impacts upon residents, visitors and the economic viability of the town, supporting the transport network and free flow of traffic to help deliver the council's corporate objectives.

The current parking enforcement contract expires on 8 April 2018. If the contract is not successfully retendered, enforcement and associated Parking services will cease in April 2018.

Preparation for the retender of the enforcement contract has been focused around the previously established key council aspirations which are:

1. Maximise the use of available technology throughout the lifetime of the contract to improve the user experience for residents, visitors and staff with the implementation of accessible, appropriate and user friendly systems/services
2. Improve the delivery and effectiveness of on and off-street enforcement with the introduction of intelligence led and flexible deployment arrangements
3. Development of a true partnership to ensure delivery of the council's service and corporate objectives
4. Minimise the contractual costs of the service whilst maximising the level and quality of performance provided

Whilst the council has had an external provider for its parking contract for a number of years, the procurement process for the new contract has separated the provision of the core parking service ICT requirements from the enforcement contract. This is a change from the current single inclusive contract approach.

Therefore, suitable contractors were invited to be considered to deliver:

- Parking enforcement services both on-street and off-street
- Parking related IT systems, including virtual permit and virtual visitor voucher technology. This was to provide the most appropriate solution for residents and visitors to the town, whilst bearing the capability to interface with enhanced digitalised enforcement and corporate services, such as Watford 2020, expected to be introduced during the life of the contract.

Enforcement services

The bids for this procurement exercise were received in September 2017 and evaluated by a panel of council officers.

A recommendation from the evaluation will be presented to Watford Borough Council's Cabinet on 4 December.

Parking related IT systems

The bids for this procurement exercise were also received in September 2017 and evaluated by a panel of council officers.

A recommendation from the evaluations will be presented to Watford Borough Council's Cabinet on 4 December.

2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative of the new contracts relating to Watford Borough Council's parking services (enforcement and IT provision) on those with the characteristics protected by the Equalities Act 2010.

The characteristics to consider within this EIA are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

3. Engagement and consultation

No direct engagement or consultation with current or potential service users was undertaken as part of the procurement exercise.

4. What we know about the Watford population

Whilst these are Watford Borough Council contracts, the regional role of the town in terms of retail, leisure and entertainment as well as it being home to Watford Football Club and the region's acute hospital means that thousands of people visit Watford each day. This means the contracts impact many people beyond the borough boundaries. These visitors can be coming to the borough for work, pleasure or for appointments such as at the hospital.

Around 6,000 parking fines are issued each quarter (on average). The majority of these are paid without question or appeal. Where there is no appeal, the service does not know the address details and, therefore, no conclusion can be drawn as to whether the service impacts more on residents or non-residents and, therefore, on a more detailed level on those who share a protected characteristic and those who do not.

In terms of the Watford population, a profile of the population of the town is outlined below.

Population

The current population of Watford is 96,800 (mid 2017 estimate) and is estimated to grown by 16% by 2026.

Ethnicity

Watford has a very diverse population more so than the rest of Hertfordshire.

For Watford, overall the Census 2011 shows the following breakdown in terms of ethnicity: White British (61.9%), White other (7.7%), Pakistani (6.7%), British Indian (5.5%) and British other Asian (4.4%).

It has been observed anecdotally that the majority of taxis drivers' ethnicity is Indian or Pakistani.

Age

The largest populations by age band in Watford are:

- 25-44 (31,700)
- 45-59 (18,100)

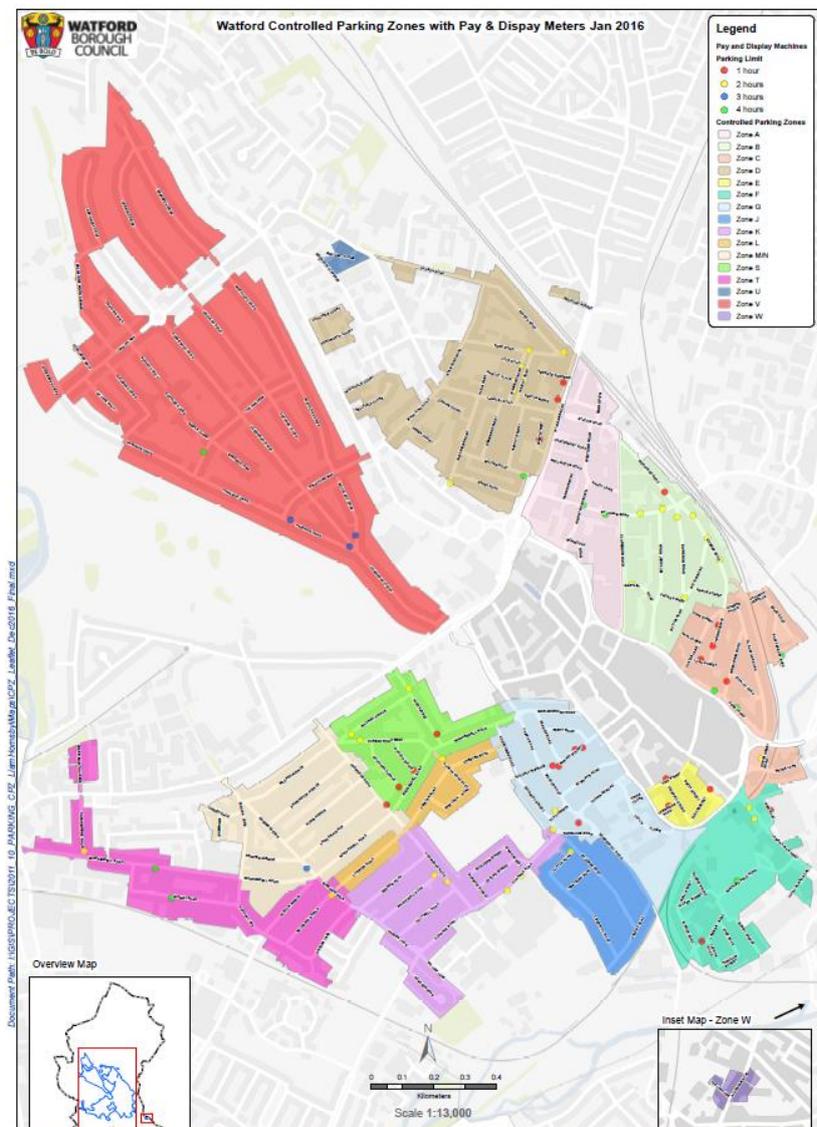
The numbers in each successive age-band fall progressively until there are estimated to be 6,000 who are 75+.

Health

Around 85% of the population of Watford state that they have 'good health' and just under 14% recording a disability.

Watford residents' engagement with the parking service

There are 16 Controlled Parking Zones (CPZ) in Watford (approx. 10,000 homes out of circa 38,000 in the borough overall) – see below for CPZ areas.



5. How will the council ensure equality is promoted through Watford Borough Council's new parking contracts

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the proposals:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

A. Positive impacts

Enforcement contract and Parking IT contract

Customer experience

The council's Invitation to Tender (ITT) for both contracts set out its aims for the successful providers in terms of our expectations to enhance the customer experience when engaging with the service. It is recognised that for many of those who experience the service, this is a result of enforcement rather than through choice but the council would still expect high quality of customer care and user experience. This is of particular importance, given the length of the contract of 9 years and the fast pace of change in how people prefer to engage with organisations and services. For example, 10 years ago far fewer people were regularly using the internet and smart phones and apps and social media channels such as Twitter and Facebook were still in their infancy.

The new contracts will offer customers greater choice, flexibility and options in terms of their interaction with the service. This will include making payments easier, allowing 24/7 digitally enabled access to key parts of the service such as payments and the use of new technology to introduce virtual permits.

Overall, residents and visitors to Watford should benefit from the new contracts but there are particularly positive impacts for some equality groups including:

- those of working age who might find it more difficult to access services during usual working hours
- those with young families and other caring responsibilities who might find it more difficult to access services during usual working hours
- those with disabilities or mobility issues who would find traditional methods of accessing services more difficult (e.g. if they require visiting a particular site)
- younger people whose known preference is to access services through new technology (based on MOSAIC profile preferences)

Web based information

The council's website features 'browsealoud' which allows people to:

- translate pages into a range of different languages
- enlarge web pages
- activate voice over for web pages
- simplify web page content

The information people will need in relation to the contract will be accessed via the council's webpages and so this feature provides additional support and help to those with a range of equalities related issues such as those for whom English is not the first language, those with visual impairment or learning difficulties.

Retaining face to face and telephone contact for those who prefer these channels

When the council closed the town centre based Parking Shop earlier in 2017, a full EIA was undertaken to understand the positive and negative impacts of this change in service. This recognised that for some people face to face and telephone contact during working hours remains a preferred option for engaging with the service. In view of this, people can visit the council offices and will be supported by a member of the Customer Services Team to complete their parking related requirements. Alternatively, telephone contact is still available.

This will continue with the new enforcement contract and so there remain positive impacts for those residents and customers who, as a result of a protected characteristic require this form of engagement and interaction.

Contractor as employer

All bidders were required to complete a equality and diversity questionnaire setting out that they comply with the council's expectations and statutory requirements.

B. Negative impacts

Enforcement contract and Parking IT contract

Whilst, overall, the new parking contracts will deliver positive impacts for Watford residents and visitors to the town, it could have the following negative impacts:

- **Those who do not have access to new technology (particularly in relation to a move to virtual visitor permits as other areas are covered through mitigation as outlined above)**
This is likely to be older people and possibly those with disabilities or those on lower incomes. Where people do not have access to the service through a PC, laptop, tablet or smart phone, they would be negatively impacted through channel shift and a 100% move to virtual payments (as originally defined through the IT contract).

However, the council has recognised this and will seek to ensure there is an alternative for those in this situation by enabling alternative access as well as online access.

UPDATE

This was identified during the evaluation stage of the procurement process and steps have been taken to address the negative impact. The preferred bidder could deliver all service requirements with the exception of an acceptable virtual visitor voucher solution to meet resident needs. The panel were not satisfied that the available solutions submitted sufficiently addressed concerns relating to service access for all users outside of office hours.

This has resulted in a third tender process – to secure a partner who can provide a virtual visitor voucher solution that will offer the flexible solutions to address the range of needs of local residents (those entitled to visitor vouchers).

6. Overall conclusion

The overall conclusion of the EIA is that, for the majority of Watford residents and visitors to the town, there will be neither a positive or negative impact from the introduction of the new parking contracts.

This is partly due to the fact that a significant number of homes in the borough are not covered by CPZ (and therefore require resident permits and visitor vouchers) and only those drivers who park illegally engage with the parking service. Additionally, in terms of protected characteristics, the new contract will have little or no impact although many may experience positive impacts as a result of the improvements to the customer experience, including greater flexibility and choice.

The process has identified a significant negative impact and mitigation has been undertaken to address this through the instigation of a tender for virtual visitor vouchers which will meet the needs of those without access to new / digital technology.

Meeting the Public Sector Equality Duty

This EIA has taken into account the council's public sector equality duty under s149 of the Equality Act 2010 and is intended to assist the council in meeting its duty. The council is required to have due regard to the need to:

- **eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act**

This is being met through a contract which identifies how the service can be more open and accessible to people through 24/7 digital service delivery.

It is also being addressed through the specific contract for visitor vouchers which has ensured that potential indirect discrimination for some protected characteristics (particularly age and disability) has been identified and mitigated.

- **advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it**

The use of new technology (with the alternative for those without access) will mean those with a protected characteristic will be able to access the service on equal terms with those who do not share the characteristics.

Information accessed via the council website will be supported by the 'browsealoud' feature means that people with certain needs related to a protected characteristic will be able to access information to the same level as those without the protected characteristics.

- **foster good relations between people who share a relevant protected characteristic and people who do not**
No impacts identified.

7. Recommendations

- Ensure the successful delivery of the virtual visitor voucher contract
- Ensure that website content relating to parking is up to date
- Review any complaints / issues during implementation of the contract to check whether there is an disproportionate impact on any protected characteristics
- Ongoing communications on how to access the service, including all channels open to customers

Summary of potential positive and negative impacts on protected characteristics

Protected Characteristic	Positive	Negative	None	Reasons for decision
Age	Some identified	Some identified		<p>Positive Younger age groups have a preference for using online and digital technology that provides 24/7 access to services. Those of working age or with younger families or other caring responsibilities would also benefit from digital / online services as it allows them to access services at a time that is convenient to them and without having to take time to visit the town centre.</p> <p>Negative The move to a more digital / online service could have negative impacts on older residents who are not as likely to be have access to new technology or skills to navigate through a site etc.</p>
Disability	Some identified	Some identified		<p>Positive Those with mobility difficulties will benefit from more digital / online services at a time that is convenient to them and without having to take time to visit the town centre.</p> <p>The council's website provides support for people with visual impairment and learning difficulties to help them access information in a way that is suitable to their needs.</p> <p>Negative The move to a more digital / online service could have negative impacts on some people with disabilities who might not have to new technology or skills to navigate through a site etc.</p>

Protected Characteristic	Positive	Negative	None	Reasons for decision
Ethnicity	Some identified			Positive The council's website provides a translation service in a significant number of languages to help people where English is not their first language access information in a way that is suitable to their needs.
Sex			Neither positive or negative identified	
Sexual orientation			Neither positive or negative identified	
Religion			Neither positive or negative identified	
Pregnancy/maternity	Some identified			Positive Those with younger families will benefit from digital / online services as they allow them to access services at a time that is convenient to them and without having to take time to visit the town centre
Gender orientation			Neither positive or negative identified	

Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
- Improved online and digital services that will adapt as technology advances	<ul style="list-style-type: none"> • Age (age related mobility issues, Parents and Carers with young children, younger people overall, those of working age) • Disability (mobility related issues, learning difficulties and visual impairment) • Ethnicity (where English is not a first language) • Maternity and pregnancy (Mobility) 	<p>Good contract management with IT supplier to ensure new technology is used where it benefits the customer experience</p> <p>Good promotion of the services so people are aware</p>

Summary of potential negative impacts and ways in which they can be removed or mitigated

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
- Change to purchasing of visitor permit	<ul style="list-style-type: none"> • Age • Disability 	The council is letting a specific contract to address this that will provide additional flexibility for those who a virtual visitor permit solution would not be accessible

This EIA has been approved by:

..... **Date**

