



**Highways Committee  
20<sup>th</sup> March, 2012**

**Report from the Head of  
Safer Streets**

For Decision

Wards Affected:  
ALL

**Response to petition regarding enforcement at Al-Sadiq and Al-Zahra Schools**

**1.0 Summary**

- 1.1 This Report informs the Committee of a petition regarding parking enforcement vehicle deployed nearby to Al-Zahra and Al-Sadiq Islamic schools. An area plan attached Appendix A

**2.0 Recommendations**

- 2.1 That the Committee notes the contents of the petition and the issues raised.
- 2.2 That the Committee notes and endorses the course of action taken by officers.

**3.0 The petition**

- 3.1 The petition, requests that the Council removes what it terms an excessive number of Civil Enforcement Officers (CEOs) and the CCTV vehicle outside Al-Sadiq and Al-Zahra schools. The petition has been verified in accordance with Standing Orders.

- 3.2 The full wording of the petition is:

*"We the undersigned petition the Council to remove the excessive number of traffic wardens and the CCTV enforcement vehicle found outside Alsadiq and Alzahra School.*

*We have been very disappointed in the unfair treatment demonstrated by the Council's traffic enforcement department against Al Sadiq and Al Zahra Schools. There are 5 Traffic Wardens and a Traffic Enforcement vehicle (CCTV) everyday in the morning just before the school starts and at home time.*

*The Council is constantly looking for ways to minimise its spend due to government budget cuts and yet still manages to spend money on A MINIMUM OF FIVE enforcement officers to prowl the streets surrounding the school every single day. It is striking that this action is only found outside Al Sadiq and Al Zahara Schhols and not outside any of the other local schools in the area.*

*Whilst it is understandable that traffic control is a vital part of street management in Brent but when such excessive action is taken outside an Islamic School it begs the question and motive behind the Council's actions and causes uncertainty amongst parents who struggle when picking up and dropping of their children at the school.*

*These prejudicial actions by the Council are further confirmed by the fact that all the local schools in the vicinity do not have any Enforcement Officers present during school drop off and pick up times.*

*We urge the Council to immediately remove Traffic Enforcement outside the school in the morning and afternoon."*

The petition has 182 signatures.

3.3 Additionally, representation has been received from the *Islamic Human Rights Commission*<sup>1</sup>, who assert that parking enforcement has:

- been too rigorous;
- discriminated against the Islamic schools; and
- asked that parking restrictions at this site be lifted for a ten minute period should be granted before and after school.

## 4.0 Detail

4.1 The safety of children in the vicinity of schools is a key feature of the wider transport strategy. School entrances can sometimes be chaotic locations for traffic and parking at the start and end of each school day, with afternoons being more problematic than mornings as parents often drop off children that travel in a car, but need to park-up and wait after school.

4.2 The Council's Road Danger Reduction Charter includes a commitment to ...

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<sup>1</sup> <http://www.ihrc.org.uk/>  
[http://en.wikipedia.org/wiki/Islamic\\_Human\\_Rights\\_Commission](http://en.wikipedia.org/wiki/Islamic_Human_Rights_Commission)

*Pursue a transport strategy for sustainable travel based on developing efficient, integrated public transport systems. This would recognise that current levels of motor traffic should not be increased. Parking restraint measures, together with other initiatives, including car clubs, travel plans for workplaces and schools, will assist in the management of finite parking space, facilitate more efficient operation of public transport and reduce the amount and perception of danger for people on foot or cycle.*

4.3 The Council's Parking Objectives includes commitment to ...

*Ensuring that the management of parking around schools is influenced and supported by school travel plans that also foster more walking and cycling; and respond to the reasonable concerns of schools that are negatively affected by parking activity;*

and

*Ensuring that parking management supports road danger reduction initiatives (especially for pedestrians, cyclists and other vulnerable road users), including Safer Routes to School initiatives and emergency access requirements;*

4.4 The Council's Parking Enforcement Policy Enforcement Objectives includes commitments to:

*Ensure an effective, transparent, consistent and fair enforcement operation is maintained to maximise compliance with the Borough's parking regulations;*

and

*Ensure that enforcement activities include targeted enforcement in the vicinity of schools to reduce the level of illegal, dangerous and anti-social parking activity*

4.5 The detail of the Parking Enforcement Policy states:

*Parking outside schools, especially at the beginning and at the end of each school day, can create road safety problems and difficulties for other road users. Parking Wardens therefore visit these areas to enforce parking restrictions during school terms on a minimum frequency basis. This is designed to stop illegal parking in restricted areas such as the zigzag marked areas immediately outside school entrances and pedestrian crossings, which have been introduced to improve child safety. This activity is undertaken in close liaison with school head teachers and the police.*

*The introduction of a mobile CCTV enforcement system will be introduced when resources permit to enforce parking regulations and*

*deal with persistently un-cooperative parents and resolve conflicts between wardens and drivers.*

- 4.6 Routine enforcement visits to schools are carried out on a rota basis so that schools are visited approximately once a month. This would comprise one CEO visit and one CCTV visit. Such enforcement visits are usually carried out between 8.30am and 9.30am and again between 2.30pm and 3.30pm in line with the school-run.
- 4.7 Where significant non-compliance is identified enforcement is incrementally increased to achieve facilitate levels of compliance.
- 4.8 The Al-Sadiq and Al-Zahra schools are independent schools associated with the Al-Khoei Foundation and are located within a site at the junction of Chevening Road and Salusbury Road in Queens Park ward. The schools and the Foundation have pedestrian entrances in Chevening Road and consequently most activity associated with pupils coming to and leaving the schools takes place in Chevening Road, Carlisle Road and Kingswood Avenue.
- 4.9 At the start of November, 2011, a complaint were received about nuisance parking in Chevening Road and Carlisle Road in the mornings and afternoons. Subsequently Civil Enforcement Officers confirmed the extent of the parking breaches and consequently increased the level of enforcement officers to 2 CEOs and a CCTV camera vehicle at both locations.

5.0

- 5.1 It appears that on occasion, and without knowing consent from parking managers, that CEOs at both adjacent schools worked together, giving unplanned impression of very intensive enforcement resource deployment at one school, which was in reality for two schools. This practice was stopped, as soon as parking managers became aware of it.
- 5.2 After 3 months raised enforcement, on 31<sup>st</sup> January, 2012 following counter-representations via the school, and having established that no further complaints had been received; enforcement reverted to one CEO at each location with the CCTV car making occasional visits.
- 5.3 Analysis for the enhanced enforcement period between 1<sup>st</sup> November, 2011 and 23<sup>rd</sup> February, 2012 is shown below. Comparative data for the same less contentious period 12 months previously is also shown (shaded and bracketed). It has not been possible to identify school only enforcement. However, time based analysis gives the closest possible approximation, as follows ...

**Any time**

	Chevening Road		Carlisle Road	
	2010/11	2011/12	2010/11	2011/12
Total visits	(998)	935	(118)	172
PCNs issued	(138)	137	(22)	14
Compliance rate	(86%)	85%	81%	91%

**School-run**  
(08.30-09.30 & 14.30-15.30)

	Chevening Road		Carlisle Road	
	2010/11	2011/12	2010/11	2011/12
Total visits	(217)	344	(38)	112
PCNs issued	(31)	52	(9)	8
Compliance rate	(86%)	85%	(76%)	93%

This data, together with the repeated complaints, is an indicator of significant levels of non-compliance. By way of comparison, the Brent-wide compliance rate at all locations is in the region of 97/98%.

However in the context of allegations of excessive enforcement, the data also shows that 6 of every 7 CEO visits to these 2 schools in recent months have not in a single FPN being issued.

- 5.4 On 16th February, 2012, Head of Transportation and Parking Manager met representatives at the Al-Khoei Foundation to discuss the issue of parking compliance and the issues raised in the petition.

The discussion was wide ranging but chiefly focussed on how the Foundation and the Council could work in partnership to move towards a situation where the impact of pupils arriving at the schools by car could be reduced (and compliance with parking restrictions improved) such that the relationship with residents in the area reduced the need for the Council to respond to requests for additional enforcement.

In essence two issues were covered:

- **Enforcement:** Officers acknowledged that the response of the Council's contractor, whilst lawful, well-meaning and consistent with the Council's policies and strategies, appeared disproportionate and was too blunt an instrument for handling the situation.

Officers apologised for the way the issue had been handled and agreed to review internal communications arrangements to ensure similar cases are handled more sensitively going forward.

They sought to re-assure the Foundation that the Council recognised the importance of faith and the value of diversity in Brent and that the way the Council had responded to local concerns was not connected to the faith of the schools and Foundation.

Enforcement has reverted to longstanding levels as described at 4.7 above. Officer agreed that for the time being to maintain this whilst the schools, assisted by the Council, consider how best to develop and implement effective school travel plans and/or other measures that improve parking compliance.

- **Promoting improved behavioural change (in relation to travel):** The Foundation indicated that they already took measures to encourage parents and carers to encourage parking compliance, reduce impact on neighbours and encourage the use of sustainable transport modes.

The Foundation indicated a willingness to explore taking this work further and to consider developing a travel plan for the schools. Such measures would, if effective, reduce the likelihood of pupil injury and reduce the environmental impact of school travel.

The Council agreed to support this new school-led initiative through assistance from the School Travel Officer. It was agreed that a subsequent meeting with the Foundation and/or the schools would be convened to explore their plans in greater detail..

Notwithstanding the agreed way forward, the Council reserves the right to adjust enforcement in the event of ineffective travel plan changes, further valid complaints from local residents or other indicators of non-compliance. Contact details at the Foundation were obtained, and it was agreed that if it was necessary to increase the agreed level of enforcement, the Foundation would be informed.

- 5.5 Subsequent review of arrangements for enforcement are based on routine, occasional, enforcement of all schools, with more intensive enforcement as and when more substantial non-compliance is identified.

Whilst this works up to a point, this case has illustrated that this well-meaning informal approach could be more transparent as comparative data on all schools is not methodically collated and used to underpin variable levels of enforcement deployment.

- 5.6 The petition suggested that the Council allowed a “grace period” at the beginning and end of the school day to support parents and carers seeking to drive pupils to the schools.

No recommendations are made in regard to this request. To do so would be inconsistent with other schools, inconsistent with policy objectives described above. The way forward is to support alternative means of travel to school through travel planning.

## 6.0 Summary

- 6.1 It is clear that there has been substantial parking non-compliance during school / nursery start and close times in the Chevening Road and Carlisle Road area, and that this has been the cause of frustration for some local residents.
- 6.2 Enforcement was increased in response to determined and frequent complaints about compliance and this has conversely been a cause of frustration for some parents, representatives of the schools and the Foundation and for the petitioners.
- 6.3 Routine assessment of parking compliance for all schools is not undertaken and officers need to consider whether this would be practicable and useful.
- 6.4 The development of a travel plan at the schools would provide a useful vehicle to reducing the risk of the situation that is the subject of this report developing in the future.
- 6.5 A course of action has been agreed that should improve the situation on the ground and reduce the frustrations described whilst recognising the Council's obligations and policies.

## **7.0 Financial Implications**

- 7.1 There are no financial implications arising from this report and its recommendations at this time.

## **8.0 Legal Implications**

- 8.1 There are no legal implications arising from this report and its recommendations at this time.

## **9.0 Diversity Implications**

- 9.1 The issues in this report raises two diversity issues:
- Representatives of Muslim parents ask whether the increased enforcement is proportionate to the level of non-compliance or whether it is a matter of discrimination based on faith.
  - A significant proportion of Civil Enforcement Officers are Muslim, and some local residents are have expressed concerns to the contractor that the parking non-compliance in their area may be connected with a blind-eye being turned by CEOs to drivers of a similar protected characteristic.
- 9.2 Investigations so far have not found any evidence to support either of these views. If any discrimination were to exist it would be counter to Council policy

and would be unintentional. However, we have started a programme of work at all schools which will determine:

- parking compliance; and
- effectiveness of the school travel plan.

This data will subsequently be used to inform future school enforcement programmes, and will provide a stronger basis to illustrate that future enforcement is founded on structured evidence which is unconnected to any potential bias.

## **10.0 Staffing/Accommodation Implications (if appropriate)**

10.1 There are no additional staffing implications. As outlined above, Civil Enforcement Officers are employed to patrol schools as part of their normal enforcement duties.

### **Background Papers**

- Letters from the Islamic Human Rights Commission

### **Contact officer:**

David Thrale,  
Head of Safer Streets  
Tel 020 8937 5454  
Email [david.thrale@brent.gov.uk](mailto:david.thrale@brent.gov.uk)

**Sue Harper**  
**Director of Environment and Neighbourhood Services**



Appendix A – map

