Impact Needs/Requirement Assessment Completion Form

Department: Environment and Neighbourhood Services	**Person Responsible: Mark Fairchild**
Service Area: Environment and Protection	Timescale for Equality Impact Assessment:
Date: 27th March 2012	Completion date:
Name of service/policy/procedure/project etc: Parking Project	Is the service/policy/procedure/project etc: New ☑ (green) Old ☐
Predictive ☑ (green) Retrospective ☐	Adverse impact ☐ Not found ☐ Found ☑ (green) Service/policy/procedure/project etc, amended to stop or reduce adverse impact Yes ☑ (green) No ☐
Is there likely to be a differential impact on any group? Yes ☑ (green) No ☐	Please state below:
1. Grounds of race: Ethnicity, nationality or national origin e.g. people of different ethnic backgrounds including Gypsies and Travellers and Refugees/ Asylum Seekers Yes ☑ (green) No ☐	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities Yes ☐ No ☑ (green)
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability Yes ☑ (green) No ☐	4. Grounds of faith or belief: Religion/faith including people who do not have a religion Yes ☐ No ☑ (green)
5. Grounds of sexual orientation: Lesbian, Gay and bisexual Yes ☐ No ☑ (green)	6. Grounds of age: Older people, children and young People Yes ☑ (green) No ☐
Consultation conducted Yes ☑ (green) No ☐	
Person responsible for arranging the review: Mark Fairchild	Person responsible for publishing results of Equality Impact Assessment:

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Person responsible for monitoring: David Thrale	Date results due to be published and where:
Signed:	Date:

Please note that you must complete this form if you are undertaking a formal Impact Needs/Requirement Assessment. You may also wish to use this form for guidance to undertake an initial assessment, please indicate.

1. What is the service/policy/procedure/project etc to be assessed?

Parking Project

2. Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet?   How does it differ from any existing services/ policies etc in this area

The Parking Enforcement Service is significantly changing the way it delivers its service. The parking operation is primarily delivered through two contracts: the Notice Processing contract and the Enforcement contracts. The Notice Processing contract, which is the contract affected by the proposed changes covers the following: Penalty Charge Notice issuing and processing, Parking Shop operations, payment receipt and permit administration. The key services that a customer uses within this contract are applying for and renewing their parking permit, purchasing daily visitor permits (to enable visitors to park in a Controlled Parking Zone) and paying Penalty Charge Notices.

The current contracts expire on 3rd July 2012, though have been extended for 12 months to 3rd July 2013. The Parking service is currently undertaking a procurement exercise for a new 5 year contract starting in 2013 which will likely allow the service to make much greater use of technology and adapt their current service delivery model to reduce operating costs.

Current Service Delivery Model

The current service delivery model, as defined by the current contract is heavily weighted towards delivering a face to face service through the parking shops. There are two parking shops in Brent:
- Pyramid House (Fourth Way, HA9 0LJ)
- Walm Lane (84 Walm Lane, NW2 4QY).

Annex 1 shows the CPZ areas in Brent and the locations of the two parking shops. Both parking shops are open to the public Monday to Saturday, 8am to 6:30pm (except Bank Holidays).

The parking shops are the only channel open to customers whom wish to purchase daily visitor permits. In addition to obtaining a service through parking shops, the following additional channels are also available to customers.

Product	Parking Shop	Online	Call Centre	IVR*	Post	Text	Display in vehicle
New permit issued	✔				✔		
Permit renewed	✔	✔			✔		
PCN payment	✔	✔	✔	✔	✔		
Daily visitor permit (scratchcard)							
- Purchasing	✔						

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							✔	
- Using for visitor parking							✔	

*IVR means 'Interactive Voice Response' and refers to an automated telephone transaction where the customer is directed through menus using either their keypad or voice.

Proposed Service Delivery Model
The proposed service delivery model involves the following changes:

- Closure of the 2 parking shops
- Introducing the option for customers to apply for parking permits online or over the telephone
- Introducing the ability to pay for parking permits using monthly direct debit and using cash at multiple retail outlets
- Introducing a virtual daily visitor permit service, to replace the existing physical system.

Note: a virtual daily visitor permits system requires a customer to have an 'account' containing credit. This account can be updated with credit either online, or over the telephone. If they live in a CPZ and have a visitor whom requires to park a vehicle, the resident notifies the parking contractor via the internet, text message or landline telephone of their visitors vehicle registration number. This replaces the existing system of a customer purchasing physical daily visitor permits and the visitor displaying one of these in their car window. It is recognised that additional assistance may be required for certain groups of people, and this is noted in section 6.

Annex 2 shows the location of:
- One Stop Shop and library locations, for those without home personal access to PC or internet
- The nearest five retail outlets for cash payments to the postcodes of the current 2 parking shops, the One Stop Shops and libraries *(this is based on information accessible from a payments providers website*)

The One Stop Shop locations are the Brent Town Hall and Brent House, which contain 4 and 2 PC's respectively. The library locations are Ealing Road (18 public PC's), Harlesden (15) and Kilburn (16) in the south of the borough, and Kingsbury (6) and the Town hall (9) in the north. There are 115 retail outlets which will accept cash payments for parking products at locations spread across the entire borough

The map in annex 2 does not include other locations which customers may elect to use, such as Internet café, educational institutions or place of work.

The cash payment at retail outlets offers customers an increased number of outlets where they can elect to pay by cash, in locations which are more accessible to users. In addition, most retail outlets offer opening hours which are more convenient than parking shops' opening times

The channels available to customers in the proposed delivery model are:

Product	Online	Call Centre	IVR	Post	Text
New permit issued	✔	✔			
Permit renewed	✔	✔	✔		
PCN payment	✔	✔	✔	✔	
Daily visitor permit (scratchcard)					
- Purchasing	✔	✔	✔		
- Using for visitor parking	✔		✔		✔

The proposal is to:
- Close the two parking shops in late 2012, during the current contract extension. The new parking contract to commence in July 2013 will not have parking shops. It is proposed that early closure offers the advantage of:

- o minimising potential disruption and the extent of business change associated with the start of the new contract
- o introducing changes to parking operations to reduce operating costs before the new contract start date.
- • Introduce and promote the use of alternative transaction channels away from face to face to improve service delivery – the current customer offer is primarily based on face to face services. The proposed customer offer will enable residents to complete transactions online or on the phone either with a call centre operator or using an automated call service (IVR). Promote the use of new transaction channels through a comprehensive communications campaign.

3. Are the aims consistent with the council's Comprehensive Equality Policy?

This project is consistent with the Council's aim to ensure that the services provided are relevant to the needs of the community.

The EIA is carried out to support good decision-making and to encourage the organisation to understand how different people will be affected by the proposed closure of the two parking shops so that the proposed service offer is appropriate and accessible to all and meets the needs of different people.

This EIA complies with the Equality Duty placed on public organisations to have due regard to the need to:
- • Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equalities Act 2010
- • Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- • Foster good relations between people who share a protected characteristic and people who do not share it

The project is consistent with the aim of the council's Equality Policy to ensure that: " services must be relevant, responsive and sensitive and that the council must be perceived as fair and equitable in its provision of services".

The project will ultimately aim to improve the quality of the service offer to our residents.

4. Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/health etc? What are the reasons for this adverse impact?

The Equality assessment has been undertaken to determine the impact of the closure of the two parking shops on the following key stakeholders affected or potentially affected by the proposal:
- • Residents of Brent who own a car and live in a CPZ area
- • Residents of Brent who do not own a car but need a daily visitor's permit
- • Residents of Brent and non-residents who use the parking shops for other transactions offered (eg PCN's)

The assessment has considered the overall aims of the proposal and there is some evidence to suggest that some groups of people may be adversely affected.

The reasons and the mitigating actions are explored in section 6 and more fully in Annex 3.

1. Grounds of race

    A significant proportion of Brent residents are from BME background This may mean that they will be less able to complete their service request on the phone or online. The analysis undertaken as part of this assessment concluded that users falling with this category have a low tendency to self service. In addition, there was some evidence to suggest that certain ethnicities may be less likely to have a bank account.

2. Grounds of gender

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None identified

3. Grounds of disability

    Some disabled users whom live within a CPZ (if they own a car and/or receive visitors with vehicles who require a daily visitor parking permit may be affected by the proposed change of service for the following reasons: those with visual impairment may not find the internet fully accessible; those with a physical impairment may find it difficult to use a mouse to navigate the web; those with a speech impediment or learning difficulties may be less able to complete their service request either via the internet or the phone; whilst those whom are deaf may not be able to complete transactions on the phone.

    Note: disabled residents whom need a blue badge, are dealt with specifically by Adult Social Care. This arrangement will not be affected by the closure of the two parking shops. However a small number of disabled blue badge holders apply for a disabled permit from the parking shops. This permit acts as a substitute permit to display in the vehicle, due to the high risk of theft of the blue badge permit itself.

4. Grounds of faith or belief

    None identified

5. Grounds of sexual orientation

    None identified

6. Ground of age

    The analysis shows that older people may be affected by the change in which the service is provided, as they are less receptive to online services. The analysis undertaken as part of this assessment concluded that users falling with this category have a low tendency to self service. Older residents may find it more difficult to cope with new technology/navigate the web or may not feel that online payments offer a secure means of transacting.

7. Gender reassignment

    None identified

8. Maternity and pregnancy

    None identified

9. Marriage and Civil Partnership

    None identified

10. Socio-economic / income

    This is not a specific protected characteristic group but may be a factor for a range of protected characteristic groups.
    The analysis undertaken as part of this assessment concluded that users falling with this category have a low tendency to self service. This assessment also acknowledges that they may not have access to the technology in their homes to be able to do so. It also acknowledges that they may be less likely to have a bank account.

5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitive) have you used to form your judgement? Please supply us with the evidence you used

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to make you judgement separately (by race, gender and disability etc).

The parking shops currently do not gather equality information of users of the service, therefore the issues / impacts analysis is largely based on the Mosaic Public Sector 2009 to cover all residents living in the CPZ areas.

The table below lists out the information sources used:

Annex	Data Source	Detail/ Indicator	Commentary
Annex 4	Mosaic	Mosaic types	To identify how many households falling within each Mosaic type live within the CPZ areas, also expressed as a percentage of the total number of households in all CPZ areas. The Mosaic customer type was also referenced against corresponding equalities characteristics
		Likelihood to self service	This indicator provides an insight as to whether customers are likely to take up the proposed service offer
		Service channels preference	This indicator provides an insight as to whether customers are more or less receptive to using online or phone services
		Access to information	This indicator provides an insight as to whether customers are more or less receptive to accessing information using online or phone services
		Car ownership	
Annex 5	Mosaic Grand Index	Internet usage	This indicator provides an insight as to whether customers tend to use the Internet
		General finances	This indicator provides an insight as to whether customer within a Mosaic type tend to own credit or debit card(s) or whether they have no direct payment account
Annex 6	Client Index	Disability	Provides the count and % of individuals on Client Index receiving a disability benefit. It also highlights that 20 disabled permits were issued by the Parking Service contractor in 2011
Annex 7	GLA ethnic group projections for 2011.[1]	Ethnicity	The ethnicity profile for the borough
Annex 8	2007 Mayhew population study	Age	The age profile of residents whom live in CPZ areas

Mosaic is a system that analyses a wide range of external data sources, to classify UK citizens into 69 customer types. Each customer type provides an accurate view of citizens and their needs. This information has been used to get an understanding of the different customer types whom live in CPZ areas, and the likelihood of each customer type to engage in self service.

The information in Annex 4 indicates the:
- The main customer types whom live in the CPZ areas
- The number of households this refers to, also expressed as a % within the CPZ areas
- Their likelihood to engage in self service, indicated by the self service dial pointing at either Very Low, Low, Average, High, or Very High
- Further information on their preference for service channels, preference for accessing information, and car ownership.

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[1] http://data.london.gov.uk/datastore/package/gla-demographic-projections

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Based on Mosaic data, and using the relevant protected characteristics, the number of households potentially affected in engaging in self service are:

Ethnicity – 12676 households (24% of households within the CPZ)
Socioeconomic – 3151 households (6% of households within the CPZ)
Age – 946 households (1.8% of households within the CPZ)

In addition, the Mosaic information in Annex 5 indicates:
- The national average (%) of customers whom don't use the internet, and particular customer types whom live in Brent CPZ's who are less likely than the national average to use the internet
- The national average (%) of customers whom don't have a bank account, and particular customer types whom live in Brent CPZ's who are less likely than the national average to have a bank account

Based on Mosaic data, the national average of customers whom don't use the internet is 30%. This is likely to be a factor with the new service model regardless of protected characteristic.

Based on Mosaic data, the national average of customers whom don't have a bank account is 5.6%. The number of permits issued in 2011 was 29331[2] . This equates to 1642 permit transactions conducted by a customer whom doesn't have a bank account. Customers can buy more than 1 permit, so the actual number of customers whom fall into this category will be lower than 1642. Using Mosaic data the relevant protected characteristics likely to be most affected are ethnicity and socio economic status (see annex 5).

Based on Client Index data, 5% of households within a CPZ have a person receiving disability benefit. This equates to 2264 households. However only 20 disabled permits were issued by the contractor in 2011. These permits relate to those customers whom already have blue badges.

Qualitative feedback from the contractor suggests that Gujarati and Urdu are the main alternative languages spoken when customers can't speak English, however the volumes are low. Nevertheless, given that the _usage_ of a daily visitors parking permit is high at approximately 700,000 per annum (distinct from the process of _buying_ a daily visitor parking permit), and that the process of using a daily visitor parking permit is changing from simply displaying a permit in a vehicle to contacting the parking contractor via text/phone/internet to notify them of a visitor, more data needs to be gathered and analysed on the extent of non English speaking households in the CPZ areas. This will inform whether any specific language based mitigation measures need to be put in place.

6. Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of the Disability Discrimination Act and the regulations on sexual orientation and faith, Age regulations/legislation if applicable)

The key issues likely to impact on protected characteristic groups identified in Part 4 of this analysis are:
- Difficulties for users who do not have access to the Internet, have difficulty in using the internet and have no computer literacy
- Difficulties for users who do not have a credit card and can only pay by cash or who do have a debit/credit card but prefer to pay by cash
- Difficulties for users who do not speak English as a first language

Whilst these may be common issues across the equality strands, the nature, extent, challenge and proposed mitigation varies.

The mitigation to address the protected characteristics potentially affected by the changes are listed in the table below. This table is an abridged version of the table in Annex 3.

Who does this affect?	Project Element	How will these be mitigated/monitored?

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Ethnicity	Transactional services and payment online	Applying for permits and setting up/topping up a visitor permit account can be completed over the telephone. One to one support in completing parking transactions can be provided in the local Council offices at the Town Hall (2 PC's) and Brent House (4 PC's) Provision for cash payments is available via a payments provider at retail outlets.	
	Virtual visitor permit system	Communications campaign to create awareness of the new processes customers will need to follow. Consideration to be given to producing literature or correspondence advising how the new system works, in different languages. More data needs to be gathered and analysed on the extent of non English speaking households in the CPZ areas, whom may use a daily visitor parking permit, and whether any specific language based mitigation measures need to be put in place.	
Disability	Transactional services and payment online (visual impairment)	The Brent website has been designed to follow the accessibility guidelines issued by the World Wide Web Consortium (W3C) and the Royal National Institute of Blind People (RNIB). Text size for the site can also be changed using the browser Applying for permits and setting up/topping up a visitor permit account can be completed over the telephone.	
	Transactional services and payment online (physical impairment)	Access keys are available on Brent's website to help users move around the key pages of the site without having to use a mouse Applying for permits and setting up/topping up a visitor permit account can be completed over the telephone.	
	Transactional services and payment online (learning disability)	A review of the web will consider layout and content to make it easy to navigate. This will be completed by May 2012. One to one support in completing parking transactions can be provided in local Council offices	
	Transactional services and payment online (hearing impairment)	Applying for permits and setting up/topping up a visitor permit account can be completed over the internet.	
	Virtual visitor permit system (visual impairment)	The option of notifying the Council of a visitor through using the landline or a text message on a mobile phone will also be available.	
	Virtual visitor permit system (physical impairment)	As above	
	Virtual visitor permit system (hearing impairment)	The option of notifying the Council of a visitor through using the internet or a text message on a mobile phone will also be available.	
	Virtual visitor permit system (learning disability)	For those customers whom have a genuine difficulty in using any technology, concessions for continuing with physical scratchcards will be continued.	
Age	Transactional services and payment online	Applying for permits and setting up/topping up a visitor permit account can be completed over the telephone.	

		One to one support in completing parking transactions can be provided in local Council offices Provision for cash payments is available via a payments provider at retail outlets The Communications campaign will help promote the change in culture required to increase the likelihood to self-serve
	Virtual visitor permit system	The Communications campaign will help create awareness of the new processes customers will need to follow. The option of notifying the Council of a visitor through using the landline or a text message on a mobile phone will also be available.
Socioeconomic/ income	Transactional services and payment online	Free PC access is available at Brent Libraries. One to one support in completing parking transactions can be provided in local Council offices Applying for permits and setting up/topping up a visitor permit account can be completed over the telephone. Provision for cash payments is available via a payments provider at retail outlets Option to pay for parking permits via direct debit, enabling customers to better manage their monthly budgets
	Virtual visitor permit system	The option of notifying the Council of a visitor through using the landline or a text message on a mobile phone will also be available.

7. Have you consulted externally as part of your assessment? Who have you consulted with? What methods did you use?   What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

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The project carried out an 8 week consultation, and invited customers to complete a questionnaire to share their views on the proposals. A range of approaches were used to capture customer response to the proposals to make services available online and close the 2 parking shops:

- A summary of the proposals and the questionnaire was made available on Brent Council's Consultation Tracker website - www.brent.gov.uk/consultation
- A sample of 2000 existing permit holders were sent a letter outlining the proposals and a questionnaire in the post with a Freepost return envelope
- Notices summarising the proposals and hard copies of the questionnaire were made available in both parking shops. Queue managers at the Parking Shops encouraged customers to complete the consultation questionnaire whilst they were waiting in queues, to be served
- Notices summarising the proposals and hard copies of the questionnaire were made available at all Brent Libraries, Sports Centres and One Stop Shops. Copies of questionnaires in alternative formats and languages were available on request
- A project specific email address was set up and publicised to deal with any requests for information and or supplementary comments.
- An article on the parking shop consultation was published in the February/March 2012 edition of the Brent Magazine.
- A notice advising of the consultation was distributed at Area Consultative Forums (ACF) in Harlesden, Kilburn & Kensal, Kingsbury & Kenton, Wembley, and Willesden.

570 questionnaire responses were received, and the breakdown of which channel they originated from is indicated in the table below:

Channel	Volume	%
Postal	318	56%
Parking Shops	199	35%
OSS	2	0%
Sports Centre	0	0%
Consultation tracker	51	9%
Total	570	100%

The consultation results showed that a number of customers were not willing to use the internet to purchase parking products and preferred to use cash, rather than credit/debit cards. As a consequence, the proposed service delivery model was modified to take this into account. These changes to the proposed model are reflected in this document.

8. Have you published the results of the consultation, if so where?

The results of the public consultation will be published with the Executive report and will be available on the Council's Consultation and Parking homepages.

9. Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?

There has been some coverage in local newspapers expressing concern about the parking shops closing, highlighting how customers without access to the internet will obtain parking permits. However this has not specifically highlighted a discriminatory concern.

10. If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think about whether the proposed service/policy etc will have a positive or negative effect on the promotion of equality of opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.

There is a potential impact for some groups on the grounds of ethnicity, age, disability and

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socioeconomic/income; however there will be mitigation measures put in place with regard to the process of buying and obtaining parking permits. (See Section 6 and Annex 3 for detail)

Whilst the council would like to encourage customers contact and payment via the internet, which is considered the most efficient transaction channel, additional channels to incorporate the telephone and text message will be accessible to customers. The aim is that the council will take advantage of more efficient and modern transaction channels and that customers should see an overall improvement in the delivery of these services.   In addition a small number of PC's are available for public use at local Council offices, and at Libraries.

More data needs to be gathered and analysed on the extent of non English speaking households in the CPZ areas, whom may use a daily visitor parking permit, and whether any specific language based mitigation measures need to be put in place.

It is also relevant to highlight that the Council is required to deliver an effective, high quality service within the context of financial constraints following reductions in funding from central government. The service is required to make budgetary savings of £200k for 2012/13 and a further £300k for 2013/14.   The Parking Service proposals include additional access channels to the internet. Effective management and ongoing monitoring will ensure continuous improvement to help ensure that equality of opportunity in accessing the council service continues

11. If the impact cannot be justified, how do you intend to deal with it?

The EIA shows that, with regard to the process of buying and obtaining parking permits, the identified potentially adverse impacts are mitigated by the proposed actions.

With regard to the usage of daily visitor parking permits, the extent of impact is currently unclear. More data needs to be gathered and analysed on the extent of non English speaking households in the CPZ areas, whom may use a daily visitor parking permit, and whether any specific language based mitigation measures need to be put in place. Further data and direct consultation with BME groups prior to implementation, and close monitoring post implementation will be carried out to assess the extent of impact, and whether specific mitigation measures need to be put in place.

12. What can be done to improve access to/take up of services?

A Communications and marketing campaign will be put in place to inform and promote the changes and benefits of the new customer offer. In addition there may be a staggered phasing out of the 2 parking shops to give residents more time to get used to the change in arrangements,

We will also gather equalities information going forward and continuously monitor the effectiveness of the Service to resolve identified issues as soon as possible, and to ensure continuous improvement.

13. What is the justification for taking these measures?

The council needs to respond effectively to the central government changes to local authority funding and still deliver a high quality, consistent customer service offer to all residents despite tighter financial constraints and the need to make budgetary savings. The leases on the 2 properties housing the parking shops are due to expire within the next 12 months, and renewing them will incur additional expense.

Furthermore, the parking contract is due to be re-tendered in 2013. It is proposed that specification for this contract will make far greater use of technology than the existing contract (specified in 2004, and based on a face to face service). The proposed changes within the current contract will enable a smoother transition and less risk of business disruption than planning a wholesale business change at the start of the new contract in 2013.

14. Please provide us with separate evidence of how you intend to monitor in the future. Please give the name of the person who will be responsible for this on the front page.

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The general equality duty is a continuing one, and equality considerations will be taken into account both when decisions are made and after the changes have been put in place. Equalities data is not currently captured within the Parking Service, and monitoring forms will be introduced going forward.

Post implementation of the changes, there will be detailed analysis of key performance indicators including transaction volumes, transaction types, processing time and take up of the various service options by protected characteristic groups following the proposed closure of the two parking shops. This will enable the Service to respond to issues that are identified. Responsibility for this will rest with David Thrale, Head of Safer Streets .

15. What are your recommendations based on the conclusions and comments of this assessment?

The assessment and the mitigations of the potential impacts demonstrate that the, with regard to the process of buying and obtaining parking permits, the project shows no potential discrimination and that the council has taken appropriate opportunities to advance equality of opportunity and foster good relations between people with different protected characteristics.

The consultation exercise was conducted via questionnaire, and customers accessing the parking shops during the consultation period would have had an opportunity to complete the questionnaire. Given that the vast majority of transactions take place in the parking shops, this would suggest that no one group would have had less opportunity to participate. Nevertheless, given that certain groups are more affected, some targeted engagement with those groups will be carried out.

With regard to the usage of daily visitor parking permits, the extent of impact is currently unclear. More data needs to be gathered and analysed on the extent of non English speaking households in the CPZ areas, whom may use a daily visitor parking permit, and whether any specific language based mitigation measures need to be put in place. Further data and direct consultation with BME groups prior to implementation, and close monitoring post implementation will be carried out to assess the extent of impact, and whether specific mitigation measures need to be put in place.

Should you:

1. Take any immediate action?

2. Develop equality objectives and targets based on the conclusions?

3. Carry out further research?

Further data analysis on the extent of non English speaking households in the CPZ areas, and some further engagement with specific groups will be carried out prior to implementation

16. If equality objectives and targets need to be developed, please list them here.

Equality objectives will need to be developed to measure and monitor which customers with specific equalities characteristics are accessing specific transaction channels, and take management action where considered appropriate.

17. What will your resource allocation for action comprise of?

There will not be a specific budget. However actions to implement the mitigation measures highlighted in this report will be the responsibility of the Parking project team. Issues that come to light once the changes have been implemented will be the responsibility of the Safer Streets management team.

Signed by the manager undertaking the assessment:

Full name (in capitals please):MARK FAIRCHILD   Date: 10/04/12

Service Area and position in the council: Strategy, Partnerships and Improvement; Service Improvement Manager

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Details of others involved in the assessment - auditing team/peer review:
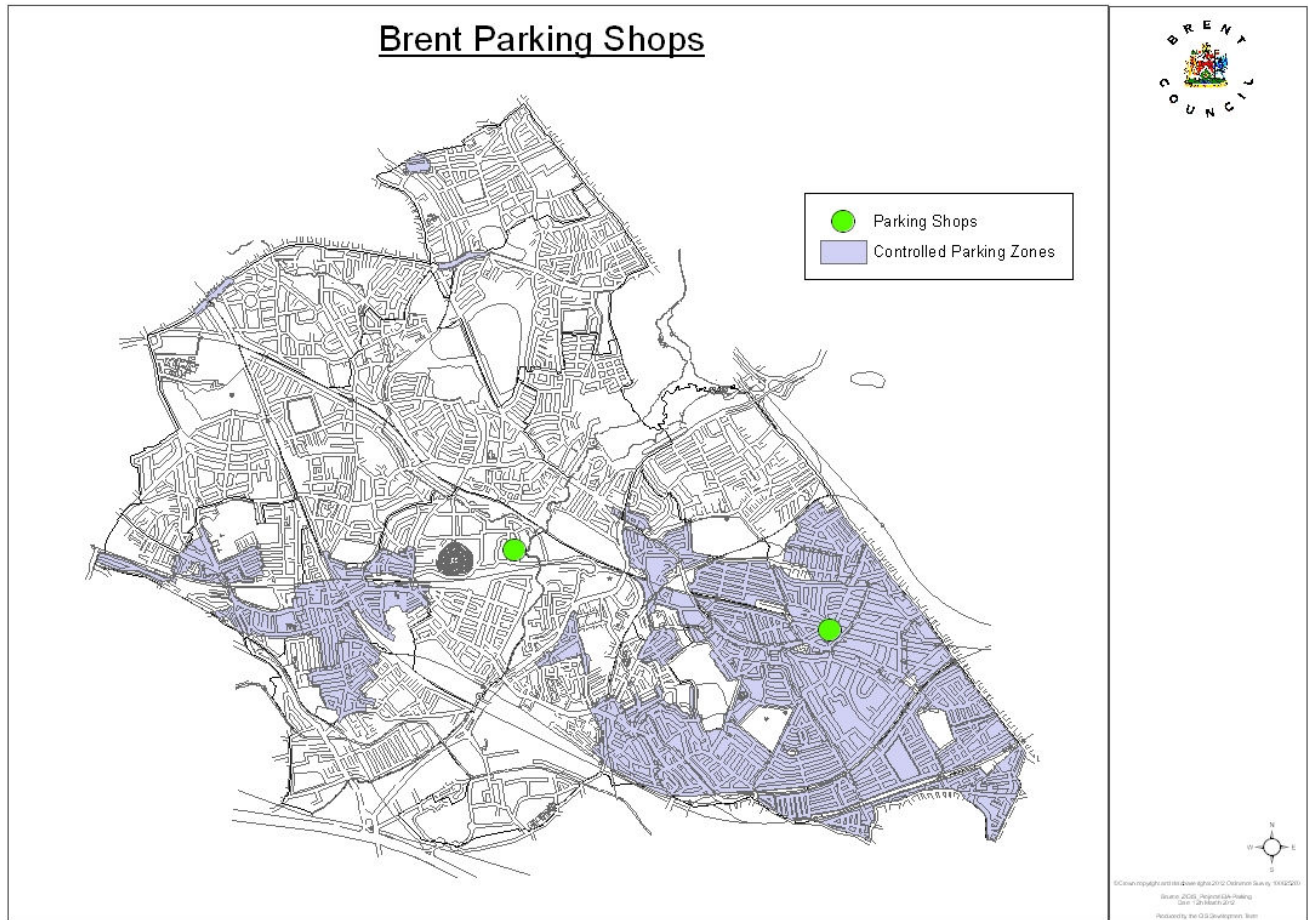
David Pietropaoli – Recycling and Waste
Elizabeth Bryan – Diversity Team
Kathy Robinson – Legal Services

Once you have completed this form, please take a copy and send it to: **The Corporate Diversity Team, Room 5 Brent Town Hall, Forty Lane, Wembley, Middlesex HA9 9HD**
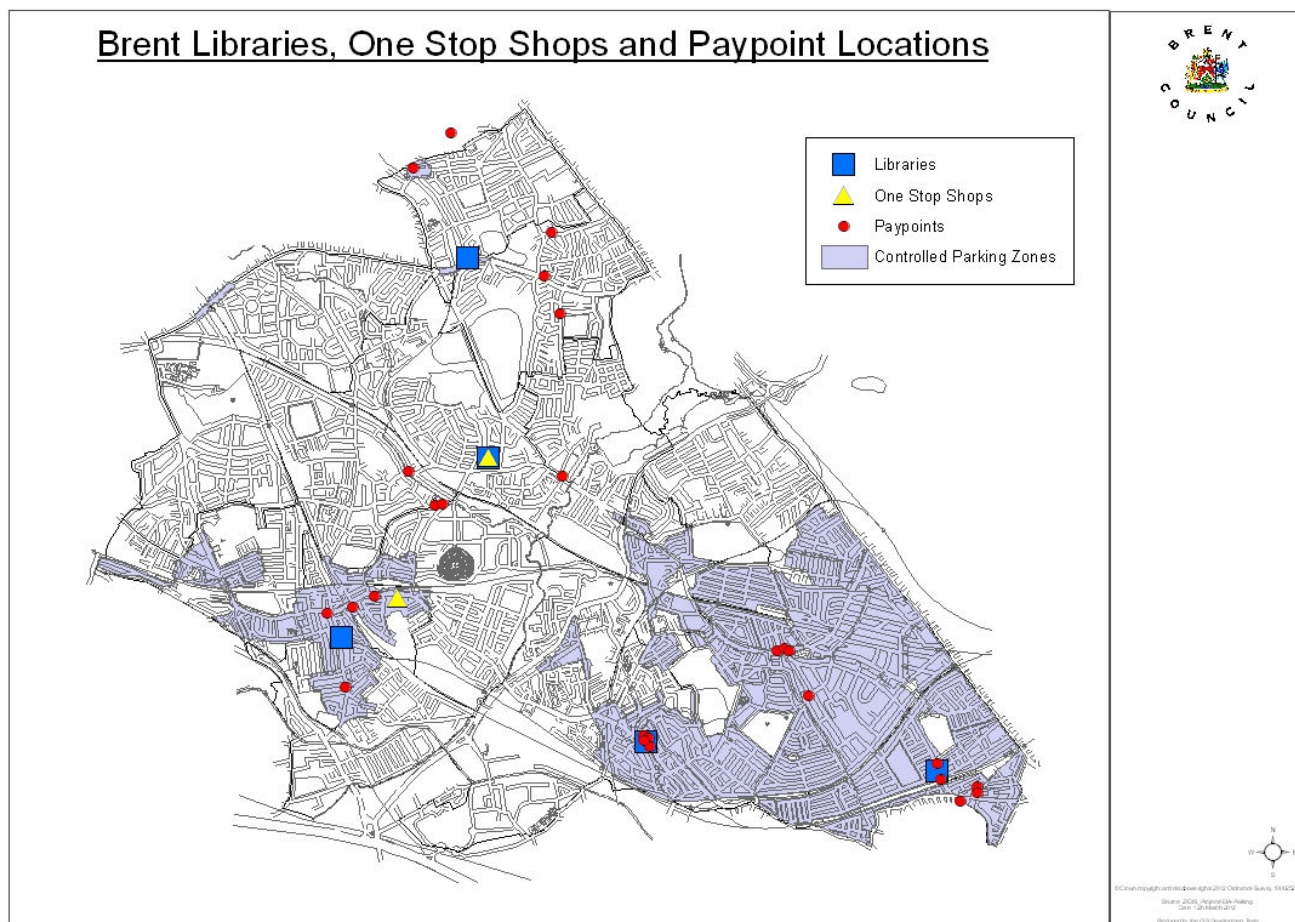
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Annex 1 – Current Service provision locations

Brent Parking Shops

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Annex 2 – Future Service provision locations

Brent Libraries, One Stop Shops and Paypoint Locations

Legend:
- Libraries
- One Stop Shops
- Paypoints
- Controlled Parking Zones

Note: the retail outlet locations which will accept cash for parking products are based on the closest 5 to the Library, One Stop Shop and current parking shop locations. The borough contains more retail outlets which will accept cash for parking products but due to the difficulty in extracting full data from the payment providers website it was not feasible to map each location.

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Annex 3 Negative affects on Equality Groups and Mitigation

1. Moving permit applications and scratchcard payments online.		
Permit applications, renewals and scratchcard payments are transactional and would be well suited to online customer self-service. This also means more convenience for the customer as transactions and payments can be made by customers at a time suited to them. A number of Mosaic groups within Brent have an average to low likelihood to self-serve. This includes Mosaic type 20 (Upwardly mobile South Asian families living in inter war suburbs), 65 (Young singles in mutli-ethnic communities, many in high rise flats), 63 (Multicultural tenants renting flats in areas of social housing), 64 (Diverse home sharers renting small flats in densely populated areas), 40 (Multi-ethnic communities in newer suburbs away from the inner city), 41 (Renters of older terraces in ethnically diverse communities), 55 (Capable older people leasing / owning flats in purpose built blocks), 58 (Less mobile older people requiring a degree of care), 60 (Tenants in social housing flats on estates at risk of serious social problems), 56 (Older people living on social housing estates with limited budgets) and 42 (South Asian communities experiencing social deprivation). Based on Mosaic data the number of households potentially affected with regard self service, against the relevant protected characteristics are: Ethnicity – 12676 households (24% of households within the CPZ) Socioeconomic – 3151 households (6% of households within the CPZ) Disability – 379 households (0.7% of households within the CPZ) Age – 946 households (1.8% of households within the CPZ) It will take time to change customers' behaviours and realise the full savings achievable through channel shift, but this can be accelerated by incentivising use of the online service where possible and an effective, targeted, communications and engagement strategy.		
Who does this affect?	**Potential negative affect (Details)**	**How these will be mitigated/monitored**
Ethnicity	**Lower likelihood to self serve** **Language** For those who do not speak English as a first language, navigating written (English) text on the website may be more difficult. **Bank Account** Some Mosaic groups defined by ethnicity may be less likely to have a bank account (see Annex 5)	The option of applying for and renewing permits, and setting up and topping up a scratchcard account via the telephone will be available. One to one support in completing parking transactions can be provided at Customer Service Points in local Council offices at the Town Hall (2 PC's) and Brent House (4 PC's). Other means of application such as contacting the contractors call centre will be available There is the option to pay in cash for parking permits and scratchcards, at local retailers whom are part of a payment providers network.
Gender	None identified	
Disability	**Visual Impairment** Those who are visually impaired may not find the	Brent council is committed to the accessibility of its web services. The Brent website has been designed to follow the accessibility guidelines issued by the World Wide Web Consortium (W3C)

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	internet fully accessible.	and the Royal National Institute of Blind People (RNIB). Text size for the site can also be changed using the browserAdditionally, customers with visual impairment can apply for parking permits or scratchcards by contacting the contractors call centre.
	Physical Impairment Those with certain physical disabilities may find it difficult to use a mouse to navigate the web	Access keys are available on Brent's website to help users move around the key pages of the site without having to use a mouse and navigate numerous links
	Learning Disability Customers who have a learning disability may also find it more difficult to navigate the web	A review of the web will consider layout and content to make it easy to navigate, and will be complete by May 2012 One to one support in completing parking transactions can be provided at Customer Service Points in local Council offices.
	Hearing Impairment Customers whom have difficulty hearing may have difficulty completing transactions over the telephone.	The option of applying for and renewing permits, and setting up and topping up a scratchcard account via the internet will be available.
Faith	None identified	
Sexual orientation	None identified	
Age	**Lower likelihood to self serve** Older residents may find it more difficult to cope with new technology/navigate the web or may not feel that online payments offer a secure means of transacting.	The option of applying for and renewing permits, and setting up and topping up a scratchcard account via the telephone will be available. One to one support in completing parking transactions can be provided at Customer Service Points in local Council offices. There is the option to pay in cash for parking permits and scratchcards, at local retailers whom are part of a payment providers network. The Communications campaign will help promote the change in culture required to increase the likelihood to self-serve
Socioeconomic/ Income	**Lower likelihood to self serve** Those on lower incomes have a lower likelihood to self-serve (Mosaic) and may not have access to the technology in their homes to be able to do so.	The option of applying for and renewing permits, and setting up and topping up a scratchcard account via the telephone will be available. Free PC access is available at Brent Libraries. One to one support in completing parking transactions can be provided at Customer Service Points in local Council offices.

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	Bank Account Those on lower incomes may also be less likely to have bank accounts.	There is the option to pay in cash for parking permits and scratchcards, at local retailers whom are part of a payment providers network. There will be the option to pay for parking permits via direct debit, enabling customers to better manage their monthly budgets.

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2.   Registering visitors using the virtual visitor permit system.

Registering daily visitors using a virtual permit system may reduce the risk of daily visitor permits being abused through existing scratchcards being sold on and used by those not eligible. The system requires that a customer notify the Council of a visitor through the internet, text or telephone, rather than the visitor displaying a physical permit. A similar scheme is in operation in Cheltenham Borough Council.

It will take time to educate customers of the new process they will need to follow, and for the existing stock of scratchcards already purchased to be run down. The transition to this scheme will involve an effective and targeted, communications and engagement strategy.

Who does this affect?	Potential negative affect (Details)	How these will be mitigated/monitored
Ethnicity	**Language** For those who do not speak English as a first language, navigating written (English) text on the website may be more difficult.	The Communications campaign will help create awareness of the new processes customers will need to follow. Consideration will also be given to producing literature or correspondence advising how the new system works, in different languages. More data needs to be gathered and analysed on the extent of non English speaking households in the CPZ areas, whom may use a daily visitor parking permit, and whether any specific language based mitigation measures need to be put in place prior to implementation. There will also be close monitoring carried out post implementation to assess the extent of impact, and whether specific mitigation measures need to be put in place.
Gender	None identified	
Disability	**Visual Impairment** Those who are visually impaired may not find the internet fully accessible. **Physical Impairment** Those with certain physical disabilities may find it difficult to use a mouse to navigate the web **Learning Disability** Customers who have a learning disability may also find it more difficult to navigate the web	The Communications campaign will help create awareness of the new processes customers will need to follow. The option of notifying the Council of a visitor through either using a landline, a text message on a mobile phone in addition to the internet will all be available. For those customers whom have difficulty in using any technology, concessions for continuing with physical scratchcards can be continued.

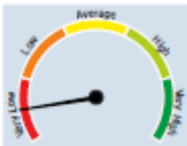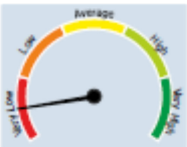## Impact Needs/Requirement Assessment Completion Form

	Hearing Impairment Customers whom have difficulty hearing may have difficulty completing transactions over the telephone.	
Faith	None identified	
Sexual orientation	None identified	
Age	Older residents may find it more difficult to cope with new technology/navigate the web or may not feel that online payments offer a secure means of transacting.	The Communications campaign will help create awareness of the new processes customers will need to follow. The option of notifying the Council of a visitor through using a landline or a text message on a mobile phone will also be available, in addition to the internet.
Socioeconomic/Income	**Income** Those on lower incomes have an average likelihood to self-serve (Mosaic) but may not have access to the technology in their homes to be able to do so.	The option of notifying the Council of a visitor through using a landline or a text message on a mobile phone will also be available, in addition to the internet.

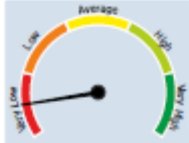# Impact Needs/Requirement Assessment Completion Form

Annex 4 Mosaic Types by CPZ – customer groups less likely to self serve & with equalities characteristics.

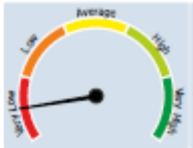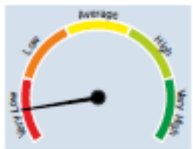| CPZ areas	Mosaic type	Description	Number of households	% of total households in all CPZ areas	Likelihood to self service	Service channels	Access to information	Car ownership	%	Equalities Trait
C, E, E2, GA, GB, GC, GD, GH, GM, GS, H, HS, HW, HY, KC, KENTON, KG, KH, KL, KM, KQ, KR_1, KR_2, KS, MA_1, MA_2, MW, NC1, NC2, NS, NT, QA, SA, SH, ST, T, W	20	Upwardly mobile South Asian families living in inter war suburbs	4108	7.83		**Service Channels** *Receptive* ■ None significant *Non Receptive* ■ Mobile Phone ■ Face to Face	**Access Information** *Receptive* ■ Internet ■ SMS Text ■ National Papers *Non Receptive* ■ Face to Face	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	46.86 27.09 8.85 17.21	**Ethnicity**
C, E, G, GA, GC, GH, GM, GS, H, HS, HW, HY, K, KB, KC, KD, KG, KL, KM, KQ, KR_1, KS, MA_1, MA_2, MW, NC2, NS, W	65	Young singles in multi-ethnic communities, many in high rise flats	2936	5.59		**Service Channels** *Receptive* ■ None significant *Non Receptive* ■ Internet ■ Telephone ■ Mobile Phone ■ Post	**Access Information** *Receptive* ■ National Papers ■ SMS Text ■ Magazines *Non Receptive* ■ Interactive TV ■ Local Papers	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	38.80 3.03 0.25 57.92	**Socio economic Ethnicity**

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					Service Channels	Access Information			
C, E, G, GB, GC, GD, GH, GM, GS, H, HS, HW, HY, K, KB, KC, KENTON, KG, KM, KQ, KR_1, KS, MA_1, MA_2, MW, NC1, NC2, NS, NT, QA, SA, SH, ST, T, W, Y	63	Multicultural tenants renting flats in areas of social housing	2255	4.30	Service Channels Receptive ■ None significant Non Receptive ■ Internet ■ Telephone ■ Mobile Phone ■ Post	Access Information Receptive ■ SMS Text ■ National Papers Non Receptive ■ Local Papers	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	40.94 5.64 0.74 52.69	Ethnicity
C, E, E2, G, GA, GC, GH, GM, H, HS, HW, HY, K, KB, KC, KD, KG, KM, KQ, KR_1, KS, MA_1, MA_2, MK, MW, NC2, NS, ST	64	Diverse home sharers renting small flats in densely populated areas	2078	3.96	Service Channels Receptive ■ None significant Non Receptive ■ Internet ■ Telephone ■ Mobile Phone	Access Information Receptive ■ National Papers ■ Magazines Non Receptive ■ Local Papers	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	38.80 3.03 0.25 57.92	
C, E, E2, G, GB, GC, GD, GH, GM, GS, H, HS, HW, HY, K, KC, KENTON, KH, KL, KR_1, KR_2, KS, MW, NC1, NC2, NS, NT, QA, SA, SH,	40	Multi-ethnic communities in newer suburbs away from the inner city	1874	3.57	Service Channels Receptive ■ Internet ■ Telephone ■ Mobile Phone Non Receptive ■ Face to Face	Access Information Receptive ■ SMS Text ■ National Papers Non Receptive ■ Face to Face	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	46.49 11.42 1.74 40.35	Ethnicity

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ST, T, W										
C, G, GB, GC, GD, GH, GM, GS, H, HS, HW, HY, K, KB, KC, KENTON, KG, KM, KQ, KR_1, KR_2, KS, MA_2, MW, NS, NT, QA, SA, SH, ST, T, W, Y	41	Renters of older terraces in ethnically diverse communiti es	1444	2.75		**Service Channels** *Receptive* ■ None significant *Non Receptive* ■ Internet ■ Telephone ■ Mobile Phone ■ Post	**Access Information** *Receptive* ■ SMS Text ■ National Papers ■ Local Papers *Non Receptive* ■ Internet ■ Telephone ■ Interactive TV	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	46.49 11.42 1.74 40.35	**Ethnicity**
C, E, E2, G, GA, GB, GC, GH, GM, GS, H, HS, HW, KENTON, KL, KR_1, KR_2, KS, MA_1, MA_2, MK, MW, NC2, NS, NT, QA, SA, SH, ST, W, Y	55	Capable older people leasing / owning flats in purpose built blocks	495	0.94		**Service Channels** *Receptive* ■ Post ■ Face to Face *Non Receptive* ■ Telephone	**Access Information** *Receptive* ■ Face to Face *Non Receptive* ■ Telephone ■ SMS Text ■ Interactive TV	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	62.52 16.91 3.19 17.38	**Age**
C, E, G, GH, GM, GS, H, HS, HW, KB, KD, KG, KR_1, KS, MA_1, MA_2, MK, MW, NS, QA, SA, W	58	Less mobile older people requiring a degree of care	379	0.72		**Service Channels** *Receptive* ■ Face to Face *Non Receptive* ■ Internet ■ Telephone ■ Mobile Phone	**Access Information** *Receptive* ■ Face to Face ■ Local Papers *Non Receptive* ■ Internet ■ Telephone ■ SMS Text ■ Interactive TV	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	62.38 2.32 1.14 34.16	**Age Disability**

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						Service Channels	Access Information			
C, E, E2, G, GH, GM, GS, H, HS, HW, HY, SA, Y	60	Tenants in social housing flats on estates at risk of serious social problems	215	0.41		**Service Channels** *Receptive* ■ Face to Face *Non Receptive* ■ Internet ■ Telephone ■ Mobile Phone ■ Post	**Access Information** *Receptive* ■ SMS Text ■ National Papers *Non Receptive* ■ Internet ■ Telephone	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	48.97 10.46 1.41 39.16	**Socio economic**
C, E, GH, GS, H, HS, HY, KENTON, NS, NT, QA, SA,SH, T, W	56	Older people living on social housing estates with limited budgets	72	0.14		**Service Channels** *Receptive* ■ Face to Face *Non Receptive* ■ Internet ■ Telephone ■ Mobile Phone	**Access Information** *Receptive* ■ Face to Face ■ Local Papers *Non Receptive* ■ Internet ■ Telephone ■ SMS Text ■ Interactive TV ■ Magazines	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	64.09 14.30 2.30 19.31	**Age**
C, E, H, HS, HY, KENTON, NC2, NS, SA, SH, ST, T	42	South Asian communities experiencing social deprivation	59	0.11		**Service Channels** *Receptive* ■ None significant *Non Receptive* ■ Mobile Phone ■ Post	**Access Information** *Receptive* ■ SMS Text ■ National Papers *Non Receptive* ■ Internet ■ Telephone ■ Face to Face	1 car/ light van 2 cars / light vans 3 cars / light vans or more None	48.99 16.85 6.36 27.81	**Ethnicity**

Mosaic customer types that account for less than 0.1% the total have been removed. 28 types have been removed which account for 0.71% of the total.

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Annex 5 Mosaic Grand Index

Category	Internet usage - non users
National Mean	29.94%

mosaic_type	Description	No of households	% of total h/holds in all CPZ areas	Significance	Equalities Trait
55	Capable older people leasing / owning flats in purpose built blocks	495	0.94	183	Age
58	Less mobile older people requiring a degree of care	379	0.72	292	Age, disability
60	Tenants in social housing flats on estates at risk of serious social problems	215	0.41	163	Socio economic,
56	Older people living on social housing estates with limited budgets	72	0.14	250	Age

Category	No direct payment account
National Mean	5.61%

mosaic_type	Description	Number of households	% of total h/holds in all CPZ areas	Significance	Equalities Trait
20	Upwardly mobile South Asian families living in inter war suburbs	4108	7.83	176	Ethnicity
65	Young singles in multi-ethnic communities, many in high rise flats	2936	5.59	162	Socio economic, ethnicity
60	Tenants in social housing flats on estates at risk of serious social problems	215	0.41	217	Socio economic,
42	South Asian communities experiencing social deprivation	59	0.11	327	Ethnicity

Note: Significance refers to the Mosaic Type mean divided by the National Mean multiplied by 100. A value of over 150 is a strong indicator that the mosaic type have a higher % than the national mean

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Annex 6 No of People Receiving Disability Benefit within CPZ

CPZ	No receiving disability benefit	No of Households	% of h/holds with a disabled person
C	135	2488	5.4%
E	42	1092	3.8%
E2	-	77	Not known
G	7	359	1.9%
GA	8	356	2.2%
GB	43	1228	3.5%
GC	110	1958	5.6%
GD	16	321	5.0%
GH	93	1439	6.5%
GM	67	1646	4.1%
GS	41	866	4.7%
H	103	1234	8.3%
HS	120	1794	6.7%
HW	186	2921	6.4%
HY	60	941	6.4%
K	73	1095	6.7%
KB	77	2130	3.6%
KC	69	911	7.6%
KD	115	2100	5.5%
KENTON	3	62	4.8%
KG	37	890	4.2%
KH	13	424	3.1%
KL	43	1626	2.6%
KM	72	1223	5.9%
KQ	73	1653	4.4%
KR_1	99	1841	5.4%
KR_2	4	150	2.7%
KS	70	2023	3.5%
MA_1	101	1848	5.5%
MA_2	38	830	4.6%
MK	47	1351	3.5%
MW	129	2351	5.5%
NC1	-	15	Not known
NC2	9	120	7.5%
NS	35	887	3.9%
NT	9	341	2.6%
QA	7	132	5.3%
SA	50	1110	4.5%
SH	15	418	3.6%
ST	13	310	4.2%
T	13	275	4.7%
W	14	421	3.3%
Y	5	99	5.1%
Total	2264	45356	5.0%

Note: 20 disabled permits were issued by the Parking Services contractor in 2011.

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Annex 7 GLA Borough Ethnic Breakdown

Ethnicity	No	%
White	117,502	41%
Black Caribbean	27,741	10%
Black African	24,182	8%
Black Other	11,294	4%
Indian	56,833	20%
Pakistani	13,067	5%
Bangladeshi	1,136	0%
Chinese	3,648	1%
Other Asian	19,519	7%
Other	14,117	5%
Total	289,041	100%

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Annex 8 provides the age profile of residents whom live in CPZ areas.

Age group	Count of Age	Percentage of total
Under 16	22843	18.8%
16-24	12505	10.3%
25-34	22006	18.1%
35-44	19574	16.1%
45-54	13567	11.1%
55-64	9244	7.6%
65-74	6838	5.6%
75+	4680	3.8%
Age unavailable	*10436*	8.6%
Grand Total	**121693**	

Data Source - Mayhew 2007 Population study