



**Executive**  
19 September 2012

**Report from the Director of  
Environment and Neighbourhood  
Services**

Wards Affected:  
ALL

**Cashless parking**

**1. Summary**

- 1.1. This report sets out options for the adoption of different ways of payment for ad-hoc parking and seeks Member approval for the pace and extent of the move towards cashless parking and the introduction of price changes to better reflect the cost of processing different payment methods.

**2. Recommendations**

- 2.1. That the Executive approve a flexible programme of replacement of coin payment machines for on-street and off-street locations with a cashless alternative and proposals for transition as set out in paragraphs 3.6 - 3.18.
- 2.2. That the Executive approve removal of built-in credit card readers in Brent car parks as set out in paragraphs 3.19 – 3.20.
- 2.3. That the Executive approve a new pricing scheme that incentivises cashless methods of payment for on-street and off-street locations as set out in paragraphs 3.22 – 3.24.
- 2.4. That the Executive approve the proposal that Brent adopt its own cashless parking identity, as part of the future procurement or renewal of the parking contract as set out in paragraph 3.25 – 3.26.
- 2.5. That the Executive approve termination of the voucher payment contract and withdrawal of this payment method as set out in paragraphs 3.29 – 3.30.

### **3. Detail**

- 3.1. Cashless parking has been trialled in Brent since July 2008 and has been borough wide since December 2010. It allows motorists to pay to park their vehicle using a mobile phone and a bank card instead of using coins in a parking machine.
- 3.2. The system offers a wide range of benefits to customers, including choice of payment method, reminders that their parking session is due to end, and extending their parking session using their mobile phone.
- 3.3. Benefits to the council include: cost reductions in respect of coin processing, machine provision and maintenance, costs of enforcement once automatic number plate recognition is introduced in the new parking enforcement contract, reduced theft of cash from machines, reductions in revenue losses and increased revenues from customers paying for extended stays.
- 3.4. The Council has around 730 pay and display machines which are principally based on street but also in 9 council run car parks. This is a much higher number than commonly found in comparable local authorities. For example our future parking partners Ealing and Hounslow have 200 and 350 respectively. Many machines are reaching the end of their reliable life, and without a transition to cashless parking, the council would need to incur the capital cost of replacement.

#### **Existing cashless use**

- 3.5. The Council are in the second year of a five year contract with our provider (Cobalt) to provide local cashless parking. Signs on all coin payment machines inform motorists of the cashless alternative. The use of cashless payment is increasing. For on-street parking, usage increased from 4% of total revenue in April 2010 to 17.7% in March 2012. The off-street parking rate of uptake was less, from 2.7% in April 2010 to 10.4% in March 2012. The increase in uptake has occurred with no additional advertising or promotion.

#### **Proposed implementation arrangements**

- 3.6. There is a strong case in favour of a move towards cashless parking. Evidence from boroughs that have already made such a change suggests the convenience of extending paid parking times, results in a greater level of parking compliance, especially towards the end of each drivers' parking session. Officers therefore propose:
  - 3.6.1. a gradual and incremental implementation of cashless parking which is reversible in the short term should customer or revenue issues arise; and
  - 3.6.2. a price incentive to encourage higher levels of parking compliance and the most cost effective form income collection.

- 3.7. The proposed approach will be gradual and incremental removal of individual pay and display machines in a way that is easily reversible should issues emerge, such as customer complaints, revenue loss or increases in parking non-compliance. Initially it is intended that machines be decommissioned in small localised pilots only followed by larger scale implementation as problems are identified and resolved.
- 3.8. Payment machines in the pilot will initially be taken out of service by covering them with a sign explaining that it has been taken out of use and providing additional information informing motorists of the alternative payment methods - cashless or other nearby payment machines. With this method payment can be reactivated at very short notice. It is anticipated that this stage will last 2 to 4 weeks.
- 3.9. If this suspension of the payment machine is considered successful, the top of the machine will be physically removed and a bespoke pole will be rented and fixed to the base, and a street sign will be attached with information as to how to pay. It is anticipated that this will be left in place for around 3 to 6 months. The base and electrical supply will be left in place, and this approach also allows easy and quick re-installation of a payment machine if required. This guards against the risk of local communities or motorists rejecting the cashless alternative.
- 3.10. The final step would be the irreversible step of excavating the site to remove the base and electric supply. This is likely to be £300 for solar powered machine, and £600 for mains powered machines. Where signage is required, this will be installed onto other existing street furniture, or onto newly install sign poles. A small stock of removed machines will be retained for spares, with the remaining be sold or disposed to obtain best value for the Council.
- 3.11. The initial criteria to consider for inclusion / exclusion of machines in pilot decommissioning include:
  - a. proximity of other payment machines;
  - b. existing levels of cashless payment;
  - c. proximity to locations at which fewer customers are likely to use a cashless option, for example close to luncheon clubs for older people.
- 3.12. The proposed changes to parking as part of the Harlesden Town Centre scheme are planned for implementation in 2013/14. It is proposed that any parking machines within the area be removed as part of the implementation of that scheme.

## **Timing**

- 3.13. The desired outcome of the proposed changes is to maximise driver convenience and satisfaction, whilst minimising operating costs and increasing revenue. Other authorities have found mixed results where over ambitious reductions in coin payments have been pursued. The most successful approach have been those in which authorities have incrementally rolled out temporary 'removal' of payment meters and monitored the impact at each site - using that experience and information to inform whether, or how fast, further removals should be planned. The evidence shows that wholesale removal is often not successful.
- 3.14. A payment machine and coin collection operation - albeit slightly smaller - would be required at the commencement of the next parking enforcement contract in July 2013,
- 3.15. It is intended that the pace and timing of the programme of removal of coin payment machines be flexible and capable of increase if implementation results in high customer acceptance and no loss of revenue. Alternatively the pace and timing can be slowed, put back or even reversed if there are implementation difficulties, customer issues or unexpected revenue losses.
- 3.16. The proposed change to increase the cost of paying by coins only will take around 4 months to implement.
- 3.17. Full implementation will ultimately require amendment of approximately 50 Traffic Management Orders (TMO). Separate Executive reports setting out transformational changes, will also require substantial amendment of the same TMOs, and all the required changes will likely require multiple amendments to most longstanding TMOs. The scale of the changes is such that it is likely that the best approach will be to completely rewrite all affected TMOs.
- 3.18. This is a very substantial undertaking and also involves a statutory consultation period. This process will take around nine months, and will likely necessitate the temporary use of external Order Writers, the costs of which are built into cost estimates.

## **Off-street parking**

- 3.19. The number of payment machines in car parks varies according to their size and usage, with the lowest being a single payment machine and the greatest being four machines. Alike with on-street payment machines, officers propose to pilot gradual and incremental removal in a way that is easily reversible should issues emerge.
- 3.20. Unlike on-street parking, off-street machines include a built-in credit card reader. Since the introduction of cashless parking, usage of this facility has fallen, and the cost of this service is no longer economical. It is proposed that this payment option be withdrawn.

3.21. It should be noted that unlike on-street parking which is zero rated for VAT, VAT is deductible from car park receipts.

### Customer pricing

3.22. The cost of processing coins is £1.158m (paragraph 5.3). In 2010/11 there were 2.3 million coin transactions. This gives an average coin handling cost of 49.8 p. per coin transaction.

3.23. Customers wishing to pay by phone currently pay an additional 20p. transaction charge. This is publicly referred to as a '*convenience charge*', and reflects the fee payable to our cashless provider.

3.24. The existing arrangement described above is counter-productive. The lower price for coin payment encourages payment using the method that incurs the greatest cost and risk for the Council. It is therefore proposed that the differential is reversed in order to actively encourage customers to use the payment method with lower collection costs and lower risks. The successful methodology used during the introduction of bus Oyster cards is recommended. Under that scheme, £1 bus fares were changed to £2 for coins and left unchanged at £1 for Oyster payment. A flat fee of 50p is recommended. This would avoid disproportionate rises for coin customers with longer stays, and almost exactly reflect the current cost of coin processing.

				On street			
CURRENT			PROPOSED				
Charge	Stay time (hours)		Cashless charge		Coin charge		
£ 0.60	1/3		£	0.60	£	1.10	
£ 1.50	2/3		£	1.50	£	2.00	
£ 2.40	1		£	2.40	£	2.90	
£ 6.00	2		£	6.00	£	6.50	
£ 9.00	4		£	9.00	£	9.50	

				Off street (car parks)			
CURRENT			PROPOSED				
Charge	Stay time (hours)		Cashless charge		Coin charge		
£1.00	1		£1.00	£	1.50		
£3.00	2		£3.00	£	3.50		
£4.50	3		£4.50	£	5.00		
£7.50	8		£7.50	£	8.00		

## **Identity**

- 3.25. Cashless parking is currently available using our cashless parking contract's commercial name, internet address and telephone number. This can be confusing for customers. It is therefore proposed that officers investigate, and if feasible implement, new arrangements for cashless parking to be promoted using the Brent brand, a brent.gov.uk URL and a Brent-owned telephone number, which would all redirect to the contractors systems and services.
- 3.26. Officers are not yet able to advise whether this is possible or practical, as this work has not yet concluded. However, if investigations conclude that this is achievable, consent to implement such a change is sought.

## **Communications**

- 3.27. A promotional campaign is planned to include a transformational changes planned for the parking service in the next 12 – 18 months. An example of the first publicity (which is deliberately light on detail, as that will follow later) is attached at appendix B.
- 3.28. In relation to cashless parking there are some key messages: how to pay without cash, building confidence in the system, and encouraging cashless payment. The key opportunities will be machine signage, possibly street advertisement, Brent website and other parking communications with drivers – perhaps leaflets with PCN correspondence.

## **Voucher scheme**

- 3.29. A pilot use of vouchers has been running in Willesden for some time. Vouchers are sold by retailers and may be displayed in a vehicle rather than a pay and display ticket. Vouchers have not proven popular with customers and the running costs are greater than income from vouchers sales - the arrangement runs at a loss. It is proposed to withdraw vouchers from sale.
- 3.30. The change will require replacement of parking signs at a cost of approximately £75k, which will be fully met from the existing revenue parking sign budget.

## **4. LEGAL IMPLICATIONS**

- 4.1. There is no specific legal duty to maintain cash payment options. However there is a general duty for the Council to exercise its traffic order making function to secure the provision of suitable and adequate parking facilities on and off the highway. It is therefore advisable to retain a number of coin operated Pay & Display machines for people who do not own bank cards or mobile phones for at least a year or so while the public gets used to the new arrangements so as to forestall any challenge.

4.2. Reference has already been made to the need to make new Traffic Orders in order to introduce the proposed arrangements. The public will have the opportunity of making representations before the Traffic Orders are finalised. The Council will have to give due weight to any objections and will have to balance the inconvenience of reducing cash payment options against the desirability of reducing operating costs.

## 5. FINANCIAL IMPLICATIONS

5.1. This report seeks to make changes to payment facilities in support of the OneCouncil Parking Project (OCP) and is one of a number of reports on this topic. The OCP expects to make financial savings through several work-streams including: future savings from retendering the parking contract, closing the parking shops, improving the collection rate for Penalty Charge Notices and reducing back-office costs through automation. This report - simplification - is just one work-stream. Overall the OCP aims to make the following net savings after allowing for implementation costs:

- 2012/13: £277k; and
- 2013/14 onwards: £300k.

5.2. Gross revenue from pay and display parking operations in 2011/12 was £3.98m split between:

- On-street £3.56m; and
- Off-street £0.42m.

5.3. The operational cost of the existing arrangements are £1.16m as shown in the table below:

Description	Cost (£)
Cash collection and low-level maintenance (6 technicians, 2 coin counters, 1 supervisor, 1 mgr)	225,000
Contractor vehicles (4 vans)	26,000
Manufacturer machine maintenance	180,000
Machine annual stock depreciation (nil budgeted)	210,000
Tariff changes (annual price rise)	35,000
Data charges	54,000
Cashless transaction charges	100,000
CEO deployment	327,600
<b>TOTAL</b>	<b>1,157,600</b>

The net surplus from existing operations is thus £2.82m per annum, with a third of all revenue received in coins being spent absorbed through the cost of handling coins:

- 5.4. The financial implications of the new proposals are complex and dependent on driver behaviour, but will result in a greater net surplus. Furthermore the explicitly preferred gradual approach to a variable pace of change as described at paragraph 3.13 – 3.15 introduces an additional range of variability into financial forecasting.
- 5.5. The financial implications in this report assume a gradual and steady shift from coins to electronic payment in line with the proportion of machines removed. However, it is possible that the proposed pricing changes set out in paragraph 3.24 result in a very substantial shift from coins to electronic payment even before any machines have been removed.
- 5.6. The savings will be realised in three ways:
  - 5.6.1. **Machine-based efficiencies:** some per machine efficiencies are immediate, for example electricity use (older machines) or data costs (newer machines); and some are annual for example manufacturer maintenance charges. The potential efficiencies here are modest.
  - 5.6.2. **Staggered contractor staff deployment:** If coin usage declines significantly, the need for staff to collect and count coins will reduce to such an extent that it will be possible to reduce deployment of staff and vehicles engaged in this work. The potential staffing efficiencies are significant, but can only be realised in a staggered way, if there is a large move away from coin payment.
  - 5.6.3. **Infrastructure costs:** If and when the final coin machines are removed, the infrastructure around coin payment can be eliminated. This includes staff, managers, vans, secure coin counting premises and safes, banking costs, vehicles and associated operational facilities such as storage of spares, spare battery charging etc.

- 5.7. at the modelling of the financial implications has been done in ‘batches’ of 100 machines, assuming a gradual shift to cashless payment in line with the proportion of machine remaining in use.
- 5.8. This change will lead to an increased cost in respect of charges to our cashless parking provider – ultimately an additional 400k per annum. However, it is anticipated that these will be more than offset by the additional income arising from differential coin charges. It is likely that this additional income will decline steeply once a significant number of coin payment machines have been removed and this assumption is modelled in the table below.
- 5.9. It is assumed that the first ‘batch’ of 100 machine removals will take place in the latter part of this financial year, following which there will be a pause ready for new contract mobilisation. We would then aim to remove a further 200 machines in each of the following years.

<i>Estimated efficiency (£ 000's)</i>	1 <sup>st</sup> 100	2 <sup>nd</sup> 100	3 <sup>rd</sup> 100	4 <sup>th</sup> 100	5 <sup>th</sup> 100	6 <sup>th</sup> 100	7 <sup>th</sup> 100
	2012/3	2013/4		2014/5		2015/6	2016/7
Cash collection and low-level maintenance	-		(25)		(100)		(100)
Contractor vehicles (4 vans)	-		-		(13)		(13)
Manufacturer machine maintenance	(25)		(50)		(50)	(25)	(30)
Machine annual stock depreciation (nil budgeted)	(28)		(56)		(56)	(28)	(28)
Tariff changes (annual price rise)	-		-		-	-	(30)
Data charges	(6)		(12)		(12)	(9)	(9)
Cashless transaction charges	100		100		50	50	50
Annualised coin charge increase	(250)		(200)		(80)	(30)	-
Machine removal	80		80		80	40	40
Corsets	5		-		-	-	-
Removal pole rental	4		4		4	2	2
Communication costs	5		5		5		10
Traffic management orders	25		-		-	-	-
Machine storage	1		1		1	1	-
Machine sale	(35)		(35)		(35)	(20)	(20)
Electricity	1		1		1	-	-
Project management	10		10		10	-	10
Redundancy	-		20			20	60
<b>TOTAL net savings (annual)</b>	<b>(113)</b>		<b>(157)</b>		<b>(195)</b>	<b>(1)</b>	<b>(58)</b>
<b>TOTAL net savings (cumulative)</b>	<b>(113)</b>		<b>(270)</b>		<b>(465)</b>	<b>(466)</b>	<b>(524)</b>

5.10. The estimated cumulative financial implications are thus:

	2012/13 (Base) £(m)	2013/14 (£m)	2014/15 (£m)	2015/16 (£m)	2016/17 (£m)
Baseline income	3.98	3.98	3.98	3.98	3.98
Less baseline cost	(1.16)	(1.16)	(1.16)	(1.16)	(1.16)
Net surplus	2.82	2.82	2.82	2.82	2.82
Cumulative efficiencies		(0.27)	(0.46)	(0.46)	(0.52)
		3.09	3.28	3.28	3.34

5.11. There will be additional savings from reduced Civil Enforcement Officer deployment from the use of automated number plate recognition technology deployed under the new contract. However, there will be lost revenue from reduced PCN issuance in respect of over-stayers. It is not currently possible to estimate the impact of these issues, and therefore we have worked on the assumption that these two items will net each other off and have a combined neutral impact on financial outcomes.

5.12. This shows a revenue surplus in all years, allowing all implementation costs to be met through revenue, and there are accordingly no capital costs.

5.13. There are no overhanging leasing costs as all machines are owned outright by the Council.

## 6. DIVERSITY AND EQUALITIES IMPLICATIONS

6.1. The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not share that protected characteristic.

6.2. A protected characteristic is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;(including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

6.3. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination. The previous public sector equalities duties only covered race, disability and gender.

- 6.4. Having due regard to the need to advance equality of opportunity between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.
- 6.5. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities.
- 6.6. The Council's duty under Section 149 of the Act is to have 'due regard' to the matters set out in relation to equalities when considering and making decisions. Accordingly due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. Members must consider the effect that implementing a particular policy will have in relation to equality before making a decision.
- 6.7. There is no prescribed manner in which the equality duty must be exercised. However, the council must have an adequate evidence base for its decision making. This can be achieved by gathering details and statistics on who use the service and how the service is used. The potential equality impact of the proposed changes has been assessed, and that assessment is found at Appendix A.
- 6.8. Data on protected characteristics in direct connection with car usage is limited and therefore use is made of wider datasets.
- 6.9. Whilst the attached EIA assessment identifies that there is likely to be a differential impact on the grounds of disability and age, the proposal includes measures to mitigate the impact as described in of the EIA, including:
  - free parking (completely avoiding the necessity for electronic payment) for drivers displaying a (disabled passenger or driver) blue badge;
  - a telephone helpline for users that or visually impaired or can speak, but not read English, or are not confident with technology;
  - a text message or smart phone app alternative for drivers that have speech or learning difficulties;
  - development of a retail shop-based cash payment alternative to electronic payment for drivers without a mobile phone or electronic payment account;
  - gradual and phased implementation of changes over 2 – 5 years, that seeks to take account of payment machines that are likely to have a higher proportion of older users, so these machines are removed later; and
  - a communications campaign to increase understanding of changes and mitigations available.

6.10. After the extensive mitigation measures described above have been considered, there may be some remaining impact. However, this are likely to be negligible given that it is increasingly difficult to legally buy a car, obtain annual insurance, obtain a driving licence, obtain car tax etc, without a bank account or electronic means of payment or by persons for whom English, or reading are difficult. The council is entitled to consider countervailing factors when deciding what further steps could be taken to further mitigate any impact, or in deciding whether to proceed with the proposals, such factors include the budgetary and practical constraints upon the Council. In the circumstances members are advised that it is reasonable to proceed as proposed.

## **7. STAFFING/ACCOMMODATION IMPLICATIONS**

7.1. There are no staffing implications for Council employees.

7.2. There are 10 contracted staff and managers engaged in the processing of coins. Within the remaining life of the existing parking contract (up to July 2013) no staffing efficiencies are expected.

7.3. Beyond July 2013, it is possible that whichever organisation is awarded the contract, will take steps to rationalise arrangements, especially if the contract is let together with Hounslow and Ealing. If and when further progress is made towards a greater cashless arrangement and the need for contractor staffing of this payment method diminishes, we would seek to handle these reductions through further natural wastage or redeployment within the Brent/Hounslow/Ealing joint arrangement. Nevertheless there remains the possibility that further redundancy costs will be incurred and these are estimated in the table at paragraph 5.9 above.

## **8. PROPERTY IMPLICATIONS**

8.1. There are no implications for Brent properties. It is likely that in the first year of the new parking contract July 2013 – Dec 2014 that the new contractor will require fewer cash facilities and these will be the facilities that the contractor is required to provide.

## **Background Papers**

- 23 April 2012 Executive report<sup>1</sup>
- EIA supporting analysis data

## **Contact officers**

David Thrale  
Head of Service  
Safer Streets  
Environment and Neighbourhood Services  
x5454

Michael Read  
Assistant Director  
Environment and Protection  
Environment and Neighbourhood Services  
x5302

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

---

<sup>1</sup> <http://democracy.brent.gov.uk/mgIssueHistoryHome.aspx?IId=7054&Opt=0>

## Appendix A – Equalities Impact Assessment

<b>Department:</b> Environment and Neighbourhood Services	<b>Person responsible:</b> David Thrale
<b>Service Area:</b> Environment and Protection	<b>Timescale for Equality Impact Assessment :</b>
<b>Date:</b> 31 August 2012	<b>Completion date:</b> 31 August 2012
Name of service/policy/procedure/project etc: Parking Enforcement Review – Cashless Parking	Is the service/policy/procedure/project etc: New <input checked="" type="checkbox"/> Old <input type="checkbox"/>
Predictive <input checked="" type="checkbox"/> Retrospective <input type="checkbox"/>	Adverse impact <input type="checkbox"/> Not found <input type="checkbox"/> Found <input checked="" type="checkbox"/> Service/policy/procedure/project etc, amended to stop or reduce adverse impact Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Is there likely to be a differential impact on any group? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	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 <input type="checkbox"/> No <input checked="" type="checkbox"/>	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Grounds of faith or belief: Religion/faith including people who do not have a religion Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
• Grounds of sexual orientation: Lesbian, Gay and bisexual Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	• Grounds of age: Older people, children and young People Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Consultation conducted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Person responsible for arranging the review: Mark Fairchild	Person responsible for publishing results of Equality Impact Assessment: David Thrale
Person responsible for monitoring: David Thrale	Date results due to be published and where: In connection with the 19 September Executive report on Brent's website
Signed: 	Date: 31 August 2012

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 Enforcement Review – Cashless Parking

## 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 cashless parking stream of the larger Parking project aims to reduce the number of active parking machines in the Borough, potentially to zero in the long term, to achieve savings from the reduction in the costs of physical revenue collection, machine maintenance and repair, cash reconciliation, and avoid potential costs from a theft from the machines. A “cashless” payment option for on-street and off-street pay and display is currently in place. However uptake has been modest. At the end of March 2012 8.6% of on-street and 3.8% of off-street transactions (17.7% and 10.4% respectively by revenue) were made using electronic methods.

There is currently a 20p “convenience charge” on top of the parking charge when electronic payments are made, but the rates of charging for cash and cashless parking are proposed to be changed as part of this project justified by the higher operational costs of the cash parking machines and to incentivise the cashless option. Following the successful approach taken by Transport for London during the introduction of Oyster Cards on London buses in 2005, when they increased the cost of cash payment by 100%, Brent proposes to adopt a similar model save that the increase will be at the lower rate of 25%, rounded up to the nearest 5p as this is the lowest denomination coin accepted by the machines (the increase ignores the 20p convenience charge levied on the cashless users, although this may change in a future project and be absorbed into the parking charge).

There are just over 700 parking machines in Brent of which 17 are located in 9 car parks. Figure 16 in the supporting analysis section shows the location of active parking machines in the borough.

Any machines that are taken out of service will not be permanently removed at this stage. Instead they will be covered with a bag preventing customers from using them. This will allow them to be brought quickly back into service should it become necessary, because of customer complaint or other observations.

It should be stressed that this project will only affect the method of payment for parking, and not the provision or availability of it. What this will in turn affect is the convenience of a cash payment location (parking machine or otherwise – all options would specifically avoid the need for a Council operative to collect the cash) to the parking space, and may therefore require a change in the current enforcement policy regarding an observation time (currently zero) to allow users a certain amount of time to visit the closest cash payment site and return. It may have to take into account the possibility that they may have to queue at this site on top of the travel time. In this case mobility may also be an issue that will have to be taken into account. Such alternative cash payment locations will be in the form of local retailers who will be part of a system to allow them to accept payment for the parking sessions. A number of such systems are available commercially and one such will be procured.

There are a number of mitigation options, listed in the supporting analysis section, which will be implemented to reduce the impact on those who for whatever reason cannot take up the cashless option. These are:

- a staggered introduction of the project;
- the ability to quickly bring machines back into service should the need arise;
- an initial thinning out of machines rather than block removal from an entire area;
- consideration of services in the area that might be used in greater proportion by the groups identified as most at risk of being affected by the changes; and

- extended observation time on parked vehicles to allow users with lower mobility time to access a cash option, which may not be as close as the original machines were.

Further mitigation plans are considered for specific disability groups below,

The progress of the project will be closely monitored in each area to allow machines to be reactivated if the need arises. This will be achieved by directly monitoring both overall customer volume (number of parking sessions) and the proportion making use of the cashless system. This will be monitored across the Borough as a whole, and at specific locations where the data collection allows, meaning that the impact of the programme in specific locations can be picked out. Furthermore the number of any complaints pertaining to the changes will be closely monitored. The frequency and duration of the monitoring will be weekly for the first two months for every location where the programme is rolled out.

### **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 deactivation of cash parking machines to promote a switch to cashless parking 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 and value for money of the service offer to our residents.

The cashless parking system will allow users to pay for their parking session from the convenience of their own vehicle; this will then avoid the need for them to visit a parking machine and to carry the cash to pay for a session. This will also improve the safety of the individuals, perceived or otherwise, as they can make the payment without having to leave the vehicle.

Those service users who find the cash payment physically difficult will also find that, even if text messaging is similarly difficult, the helpline option will enable them to utilise the cashless system and avoid a difficult cash transaction.

It is worth also noting that the electronic payment option is offered in a large number of other locations across London and nationally, and those choosing to use the service in Brent will be able to use the same account to pay at many of these without further registration (similarly in Brent if they have previously registered to use parking elsewhere).

The cashless system also has a lower operating cost than the cash parking machines, and will therefore offer a saving to the Council once a significant number of parking machines are deactivated, all other levels of use remaining equal. This lower operating cost is reflected in the increase in charges for cash payment.

**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 deactivation of parking machines, the method of payment to be shifted to the currently available but underused cashless option, bearing in mind that alternative cash payment options will be introduced, and taking into account that an increase in the price when paying by cash will be introduced to incentivise the change to cashless methods. Alternative cash payment options will be in the form of a system whereby local retailers can accept the cash payment for a parking session, of which a number of suppliers are available to provide this service via retail outlets, The following key stakeholders will be affected or potentially affected by the proposal:

- Brent residents driving within the Borough to use car parking
- Non-Brent residents driving from outside the Borough to use car parking

An assumption that those parking in Brent may be equally drawn from Inner and Outer London, as Brent sits between both in terms of its location, and so where possible statistics for London have been used to investigate characteristics of this population, however in some cases those for England or the UK are the only available. It was decided that it was not suitable to restrict the investigation to the characteristics of Brent only, both on the above grounds and that relevant data was not available at this level. It should be stressed that no equalities data is collected on the users of parking in Brent as the transaction is not one that allows for that level of interaction. There is no data specific to users of Brent Parking, and indeed no data combining the key factors relevant here: the access to a car and the ability to drive one, the possession of a mobile phone, and to hold a bank account that can be used to make payments over the phone. Such data is not even available at a national level. Where possible data on these three factors, specific to the groups with protected characteristics, has been used at the London-wide level, but in some cases such information was only available at country or national levels.

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 2 and more fully in the Supporting Analysis section.

**1. Grounds of race**

Research by the Department for Work and Pensions (DWP) for their Family Resource Survey (2010/11) indicates that while 4% of London households had no bank account (suitable for cashless parking), but looking at the ethnicity of the heads of households nationally this figure is between 5% for Chinese or Other Ethnic Groups increasing to 6% for Mixed, Asian or Asian British, Pakistani and Bangladeshi, and Black Caribbean groups, 7% for Indian and Black or Black British groups and 8% for Black non-Caribbean groups (compared with 4% for White groups). Lacking such an account would prevent the user from accessing the cashless option, and therefore be subject to any inconvenience in accessing the cash option and the increased parking charges for cash users.

The same survey investigated household income by ethnic group and found that Asian and Asian British, and Indian groups had higher incomes than White groups, and will therefore be less exposed to the increase in the cash payment cost. The Mixed, and Chinese or Other Ethnic Group groups were roughly similar to the White group and cannot be considered particularly more exposed to the increased price. Some groups had lower household incomes and can be considered more at risk of adverse impact from the increased charges: Pakistani and Bangladeshi, Black or Black British, Black Caribbean, and Black Non-Caribbean.

No information was available regarding the take up of mobile phones among different ethnic groups, however the OFCOM Communications Market Report 2012 notes that 93% of adults in "urban England" own or use a mobile phone.

In the Department for Transport's (DfT) National Travel Survey (2010) there is data on the ability to

drive and access to vehicles, and ethnicity. While overall 32% of individuals either could not drive or did not have access in their household to a car or van, this is 31% for White groups (30% for White: British) and 39% for Asian: Indian groups, increasing to as high as 64% for Black: African groups, with a spread in between for other groups mostly in the 50% region.

Where race is an indicator of a group that may not have English as a first language they may have difficulty accessing the phone service, however a telephone helpline does exist to help people who can speak, but not read English, and the online option is also there allowing users to register for the service in a more relaxed manner. Once set up, the action of sending a text to use a parking session is requires no more fluency in English than operating a parking machine. Brent Council currently only offers assistance materials for other languages upon direct request from a user, such materials will therefore only be created on an ad-hoc basis.

Altogether, although the rate of bank account holding is as high as double for some BAME groups compared to White, the proportions of individuals with access to a vehicle is much lower. Although it can only be speculated whether there is likely to be any correlation between those with vehicles and those with bank accounts the relatively low numbers of individuals without an account, coupled with the generally high take up of mobile phones, and the comparatively lower likelihood of driving and therefore requiring a parking space, any impact on grounds of race is likely to be small.

## **2. Grounds of gender**

The DWP report (2010/11) indicates that overall the proportion of adults with no bank account in the UK is equal for males and females at 6%, although there are variations in this across age groups, however never by more than two percentage points.

There was no information on mobile phone usage and gender.

From the DfT survey (2010) there was information regarding gender in the form of proportions of those holding a full driving license, regardless of whether there was access to a vehicle. For males the proportion with a license was 80% while for women it was 66%, although there was much variation across the age groups. In the youngest age group 17-20 the proportions were roughly equal at 35%, but a gap gradually widens until for 70+ 78% of males have a license while only 41% of females do. Between these ages the proportions increase to a peak in the age groups 40-49 and 50-59 before dropping off again, the fall being much more pronounced for females. There was also a single statistic showing that 26% of males and 38% of females in households either have no access to a vehicle or are not able to drive, which is a roughly similar effect.

Impact on grounds of gender will therefore be very low, but likely to be greater for males if you assume that as proportionally more of this group have licenses more are likely to be driving and parking.

## **3. Grounds of disability**

There is no information on ability to drive or access to a vehicle, or on mobile phone take up, amongst disabled groups, and there is very little on the proportions without a bank account. The DWP (2010/11) found that the proportion of households containing one or more disabled persons without a bank account was slightly higher than for households in London at 6%. Therefore there will be little impact on grounds of disability due to the policy basis, however the practical realisation of the project may have an impact as described below, while noting that residents registered as disabled whom have a blue badge will not be affected by the changes as they may park free of charge in any of the pay and display bays.

### **Sight Impairment**

Users who have a sight impairment but who are still able to drive will be able to make use of the cashless system in almost all cases. Users can call a helpline if their impairment makes the use of text messages difficult.

### **Hearing Impairment**

Hard of hearing users may have difficulty accessing the phone line to register and use the cashless

system; however text message and internet options exist allowing them alternative routes to access. Currently no provision for adaptations for the deaf or hard of hearing exist on the helpline.

#### **Mental Health**

Individuals with a mental health condition should not be affected by the proposed changes.

#### **Learning Disability**

Individuals who are capable of driving are assumed to also be capable of utilising the cashless option; a helpline is available for those unable to use the text message option.

#### **Mobility Issues**

Including those who are physically impaired, and those with a long standing illness  
Those individuals with mobility issues who cannot use the cashless option may find the cash payment locations not as convenient as currently, and may take longer to reach them and return to the vehicle with the evidence of payment (if the cash system works that way). A change to the observation time allowed before a parking penalty is issued will be implemented to mitigate impact on these users. The helpline is available for those who find using text messages difficult for physical reasons but are still able to use a phone for voice calls.

In addition the location of the machines will be taken into account, and those in locations found to be in frequent use by such groups will be de-prioritised for deactivation.

Where users are able to make use of the cashless option they will find it more convenient and safer than having to take cash to a parking machine.

#### **4. Grounds of faith or belief**

None identified

#### **5. Grounds of sexual orientation**

None identified

#### **6. Ground of age**

The DWP research (2010/11) indicated that the proportions of individuals in the UK with no account varies with age, from 9% in the 16-24 age group, then dropping quickly in the age groups from 25-84 to 5% or so, but rising again to 7% for those over 85. This does not present a particularly large difference across age groups.

The OFCOM report (2012) states that for age groups between 16 and 54 97%-99% of adults own a mobile phone, but this drops to 91% for 55-64 and falls further to 68% for those over 65. Looking at households and the individuals within them the picture is very similar, with 98%-99% for those in groups between 16 and 54, 94% for 55-64, 89% for 65-74, and finally 62% for those over 75.

The DfT survey (2010) looks at proportions of those holding full driving licenses by age and finds that for younger adults around 35% have a license between 17-20 years old, but this quickly increases to a peak of around 81%-84% between 30 and 59, then dropping slowly to 79% for 60-69, then down to 57% for those over 70.

Again it can only be speculated how these factors may be correlated within the population, however the older groups are much less likely to have a mobile phone and so be able to make use of the cashless option. They are also slightly more likely to be without a bank account, but actually it is the younger people who are the least likely, although the difference is not very large, just a few percentage points. Both these effects may be somewhat mitigated by the relatively lower likelihood of these groups to be driving.

For those who are less confident with mobile phone technology a helpline does exist, and the process of setting up an account can be accessed at a more relaxed pace online. This will be mitigated by considering the location of a machine to be deactivated carefully, and special consideration will be

given to any nearby services that might make it more likely for older people to wish to use those parking spaces in particular.

Older people may also be more affected by mobility and the convenience of the cash payment locations moving further away. This will be mitigated by a change to the observation time before a parking penalty is issued.

Where users are able to make use of the cashless option they will find it more convenient and safer than having to take cash to a parking machine.

#### **7. Gender reassignment**

None identified

#### **8. Maternity and pregnancy**

None identified beyond mobility issues considered elsewhere.

#### **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 DWP survey (2010/11) found that for households with a weekly gross income of more than £500 2% or less had no suitable bank accounts. However, as that income decreased the percentage of households quickly rises to 7% for £200-£300, and to a maximum of 11% for those on £100 or less.

The OFCOM report (2012) uses the National Readership Survey socio-economic classification to describe mobile take up. For the aggregated group ABC1 (non-manual workers of all levels) 97% of households had a mobile, for C2 (skilled manual workers) it was 96%, but for the aggregated group DE (semi-skilled and unskilled manual workers, and pensioners, low grade workers and those on benefits only) it was only 87%.

Using a different classification based on equivalised household income quintiles the DfT survey (2010) found that for individuals in households those who either had no access to a vehicle or were unable to drive was only 13% for the top income quintile, and gradually increased to 57% for the lowest.

Once again, it is impossible to speculate how these factors may be correlated, but those on the lowest income, while being least likely to have a bank account or mobile phone, are also the least likely to be able to drive, or have access to a vehicle. For the lowest incomes the cost of running a car may be prohibitive beyond what these statistics indicate. However, for anyone needing to park in the lower groups the impact of the 25% increase in cash parking costs is going to affect them the most, as a proportion of their income. It is important to note that those who use a Post Office Card Account to receive their benefits, but have no other bank account will not be able to use this to access the cashless system.

There is no mitigation in place to assist those on the lowest incomes who need to park but are unable to use the cashless system because of a lack of mobile phone or bank account, and will therefore be exposed to the increased cash charges,

**5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make your judgement separately (by race, gender and disability etc).**

The evidence for the points in section 4, as described under each heading, can be found in the supporting analysis section at the end of this document. The data for this has been drawn from surveys and research:

- National Travel Survey 2010 (published July 2011) by the Department for Transport
- Family Resources Survey 2010/11 (published June 2012) by the Department for Work and Pensions
- Communications Market Report 2012 (published July 2012) by OFCOM

It must be stressed that no data on the users of parking in Brent exists, particularly regarding equalities groups. For reasons described elsewhere in this report the data used to support the conclusions has been drawn from research at a London-wide, or where that was unavailable, a country or national level. It is assumed that those parking in Brent are not drawn solely from within Brent and so no consideration of the particular characteristics of the population of Brent has been made.

#### **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)**

For many groups there are no unmet needs that can be identified, however for some disability groups specific considerations have been made.

##### **Sight Impairment**

Users who have a sight impairment but who are still able to drive will be able to make use of the cashless system in almost all cases. Users can call a helpline if their impairment makes the use of text messages difficult.

##### **Hearing Impairment**

Hard of hearing users may have difficulty accessing the phone line to register and use the cashless system; however text message and internet options exist allowing them alternative routes to access. Currently no provision for adaptations for the deaf or hard of hearing exist on the helpline, but it may be possible to introduce these to the service.

##### **Learning Disability**

Individuals who are capable of driving are assumed to also be capable of utilising the cashless option, a helpline is available for those unable to use the text message option.

##### **Mobility Issues**

Including those who are physically impaired, and those with a long standing illness. Those individuals with mobility issues who cannot use the cashless option may find the cash payment locations not as convenient as currently, and may take longer to reach them and return to the vehicle with the evidence of payment (if the cash system works that way). A change to the observation time allowed before a parking penalty is issued will be implemented to mitigate impact on these users. The helpline is available for those who find using text messages difficult for physical reasons but are still able to use a phone for voice calls.

Mobility issues may have an impact on grounds of age; the same mitigations apply as above.

In addition the location of the machines will be taken into account, and those in locations found to be in frequent use by such groups will be de-prioritised for deactivation.

#### **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?**

No external consultation has been performed as part of this assessment.

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

N/A

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

None at this point (as there is no awareness of it), however a recent blanket removal of parking machines to enforce a switch to cashless parking in Barnet was not well-received and was the target of negative media coverage.

**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.**

As long as mobility issues can be mitigated the impact of this project should not have an overall adverse effect, as the cashless system will be cheaper for the user (pending the cash price increase), more convenient and quick to use to pay for parking, and save the Council money in the reduced requirement for revenue collection, machine maintenance and other associated expense.

The concurrent increase in price to be implemented for the cash payment methods will impact those on lower incomes more than others, but it is justified by the higher operating costs of the cash parking machines.

In the case of grounds of race or socio-economic group while those with protected characteristics have been shown to be both the less likely to hold a bank account, and in the case of the lowest economic groups less likely to have a mobile phone, it has also been shown that they are also less likely to have or drive a car. While the first two factors will mean that such individuals will not be able to use the cashless option, and will therefore be exposed to the increase in the cash payment price, they are also the least likely to require parking. Although it has not been shown that any of these are correlated – so there is no way to know whether those individuals without bank accounts are also those without mobile phones, and yet amongst those who do drive a car – this is the best information available.

Where grounds of race indicates a lack of fluency in English there may be an adverse impact if the user were unable to interact with the cashless system, and therefore was left with no choice but to pay the higher cash charges. This is mitigated by the fact that the cashless system is not very much more complicated than the current machines, and is further justified by the Council's general position that language support will not be given except when specifically requested by the user.

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

N/A

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

A communications plan to boost take up of the cashless option should be initiated at the earliest opportunity, followed by further communications to specifically outline the project, its aims, expected outcomes, and the locations of its implementation (as it will be staged).

Those groups most likely to be impacted or have more concerns about the project can be engaged with directly through the various means available, and this will also form part of the communications plan.

No further detail is available at this time.

**13. What is the justification for taking these measures?**

If take up can be boosted before the project gets underway the transition will be smoother and the focus can be more on helping those most affected groups during the project itself.

**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.**

The progress of the project will be closely monitored in each area to allow machines to be reactivated if the need arises. This will be achieved by directly monitoring both overall customer volume (number of parking sessions) and the proportion making use of the cashless system. This will be monitored across the Borough as a whole, and at specific locations where the data collection allows, meaning that the impact of the programme in specific locations can be picked out. Furthermore the number of any complaints pertaining to the changes will be closely monitored. The frequency and duration of the monitoring will be weekly for the first two months for every location where the programme is rolled out.

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

Close monitoring for complaints and comments at each location at the start of the project is required, although this could be reduced if the early stages are successful. Weekly monitoring of usage levels, cashless proportion, and any complaints arising will be conducted weekly for the first two months of roll out in any specific location.

There are no specific recommendations for monitoring the impact on equalities groups, for the same reasons that no specific data was available on these groups to be used in this report. The parking transactions do not allow such information to be collected. However, it will be possible to monitor these for any complaints generated by the project, and this information will be monitored.

Should you:

1. Take any immediate action? **No**
2. Develop equality objectives and targets based on the conclusions? **No**
3. Carry out further research? **No**

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

N/A

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

Resources for monitoring the introduction sites.

If you need more space for any of your answers please continue on a separate sheet



Signed by the manager undertaking the assessment:

Full name (in capitals please): DAVID THRALE

Date: 31 August 2012

Service Area and position in the council:

Head of Service, Safer Streets, Environment and Neighbourhood Services

Details of others involved in the assessment - auditing team/peer review: John Birkett

## EIA supporting analysis

### **Availability of data on service and service users**

The only data available on the current service is the location of the parking machines, and the total revenue and total number of transactions made, broken down by on- and off-street, and cash or cashless mode. There is no demographic data available on service users at all, neither is there any information on how far they have travelled to park or their reasons for the journey and choice of parking location. In fact, the only thing that can be said with any certainty is that the parking payer must have access to a mobile phone (for the most convenient use) and a bank account. The payer needn't even be the car driver or owner, however in the following analysis this will be ignored as a negligible situation, and the assumption is made that the payer is the car owner and driver.

To get around the lack of data on specific users the analysis will assume that they are drawn from the local area (including neighbouring boroughs). The assumption will be made that the service users will be drawn from a population similar to that of London as a whole. This need not imply that service users come from across London, but that as Brent is positioned roughly half-way out from the centre of London users may be drawn from both Inner and Outer London in proportion with the population as a whole. This assumption allows use of some datasets produced at no smaller than a regional level. However, some data is only available at a national level. This represents the only way to include any robust data in this analysis.

One group that can be disregarded is service users with a registered disability. These users are entitled to a Blue Badge which allows them free parking at any of the Pay and Display locations in the Borough. As such they will never need to use either a parking machine or the cashless options.

### **Comparing population bases**

Whilst in some way or other every local authority in the UK is unique, it is illustrative to examine some of the aspects that may need to be considered in relation to various diversity groups.

The Department for Communities and Local Government's English Indices of Deprivation 2010 (<http://www.communities.gov.uk/publications/corporate/statistics/indices2010>) has a domain that specifically looks at income. This takes into account the proportion of individuals in receipt of various income support payments. A rank is awarded to each LSOA in England (an LSOA is an area defined by the Office for National Statistics as part of their 2001 Census result publication procedure, roughly speaking they build up into Wards. There are 174 LSOAs in Brent). By categorising them into deciles we can count how many there are in each national decile within a smaller region, and so compare proportionally the distribution of deprivation in such a region. In figure 1 we compare Brent with Inner and Outer London, the whole of London and England (the deciles are obviously equally distributed in England). What it shows is that London is much more deprived than England as a whole, and lying somewhere between the even higher deprivation of Inner London and the slightly lower deprivation of Outer London. However, Brent is very much more deprived than all of these, in fact around

96% of the LSOAs in Brent are in the most deprived half nationally (compared with around 69% for London), and no areas in the 20% least deprived nationally.

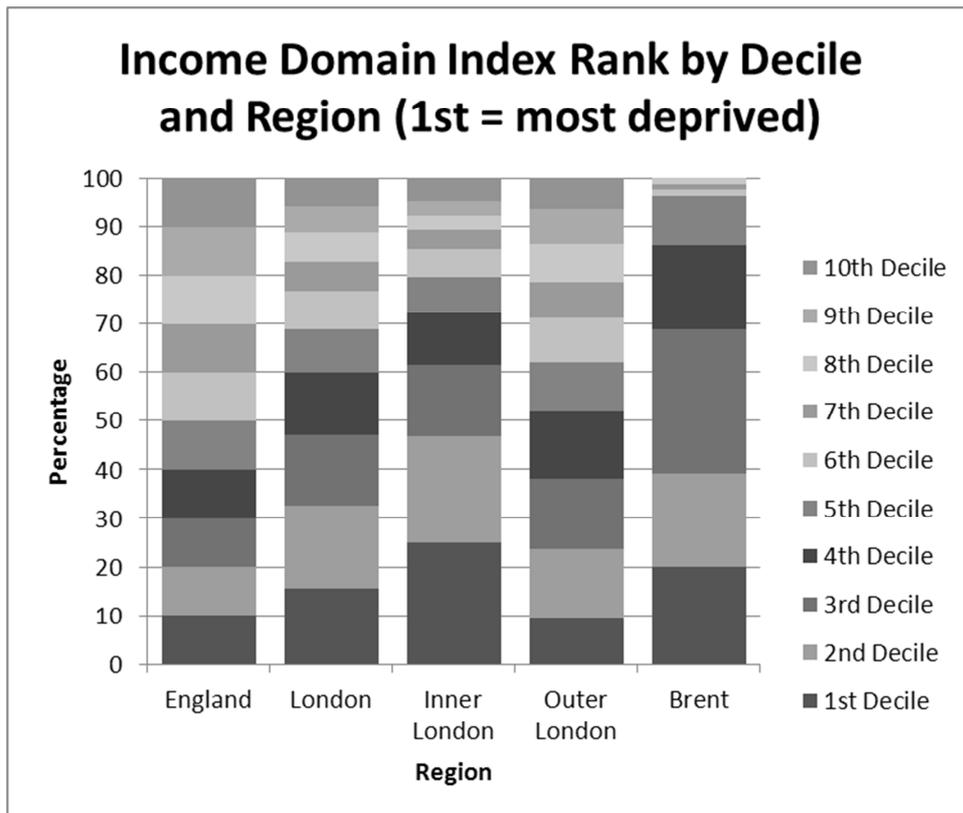


Figure 1

A supplementary Income Deprivation Affecting Older People Index is also produced with the indices, looking only at the proportion of those aged 60+ and living in income deprived households, a subset of the Income Domain population. This is presented in a similar way in figure 2. While the relation between London and England is almost the same as in the general Income Deprivation domain this time Inner London is substantially more deprived, Outer London a little less deprived, and Brent is still the most deprived (although in a very similar distribution to the Income domain) with 97% of areas in the most deprived half nationally (this time with no areas in the 30% least deprived nationally).

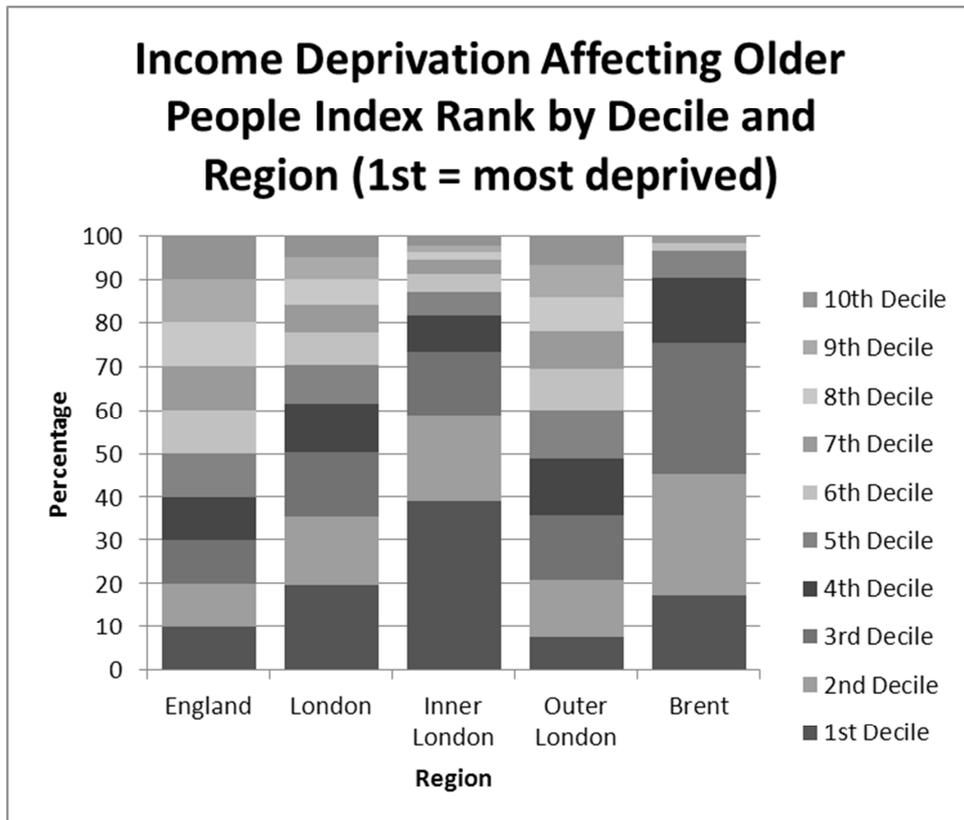


Figure 2

As the detailed results of the 2011 Census are not yet released the most recent estimate of ethnic populations is the Office for National Statistics' Population Estimates by Ethnic Group for mid-2009 (Table EE1, Population Estimates by Ethnic Group Rel.8.0, Office for National Statistics, 2011). An analysis of this is displayed in figure 3. While Brent clearly has a far lower proportion of White groups than England, or London, or indeed the Inner or Outer parts of London, this is mainly due to the much higher proportion of Asian or Asian British, and Black or Black British groups, Mixed, and Chinese or Other Ethnic Group groups being more in line with the London proportions. It can also be seen that London has a much lower proportion of White groups than England as a whole.

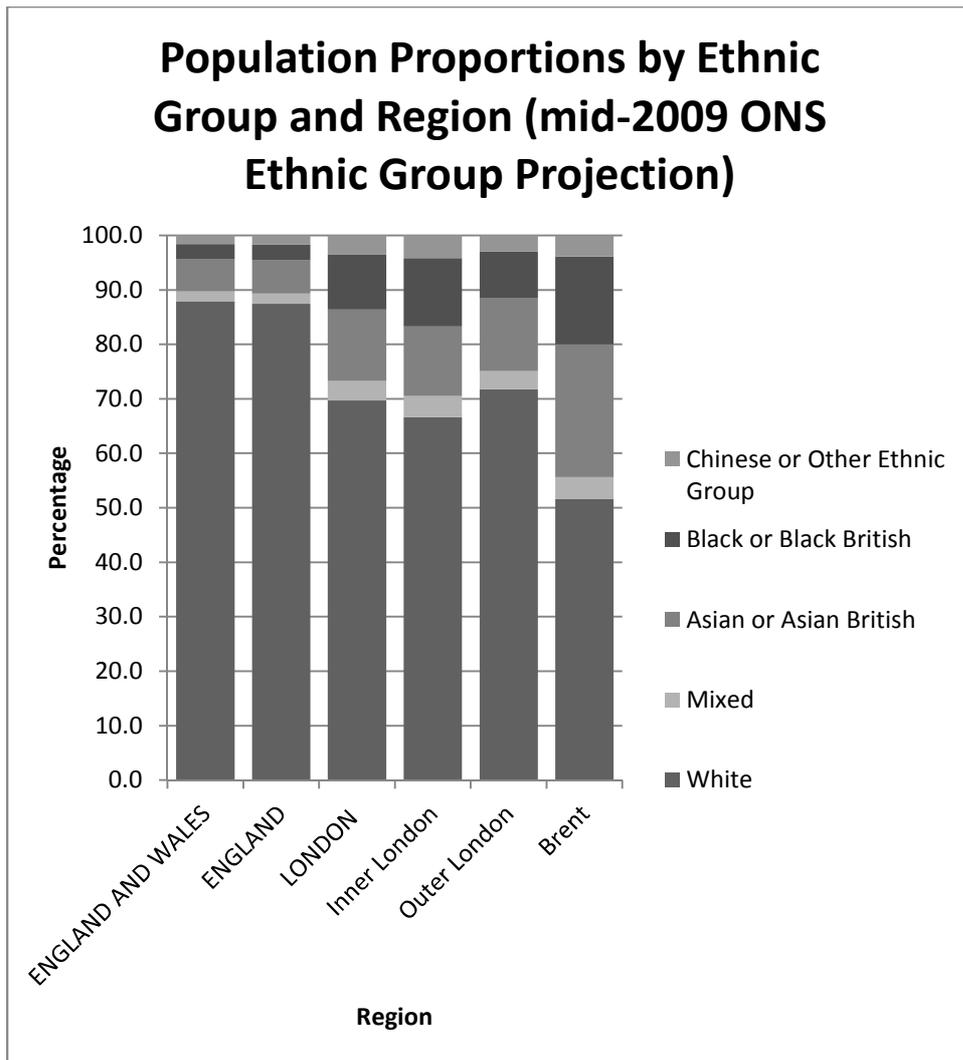


Figure 3

Headline figures for the 2011 Census (<http://www.ons.gov.uk/ons/guide-method/census/2011/index.html>) have been released, and we can investigate the age breakdown in 5-year groups using this information. This is shown in figure 4. Generally speaking the age breakdown of London and Brent are very similar across all age groups, both being significantly higher than England in the 25-34 ranges and somewhat lower at 55 and above.

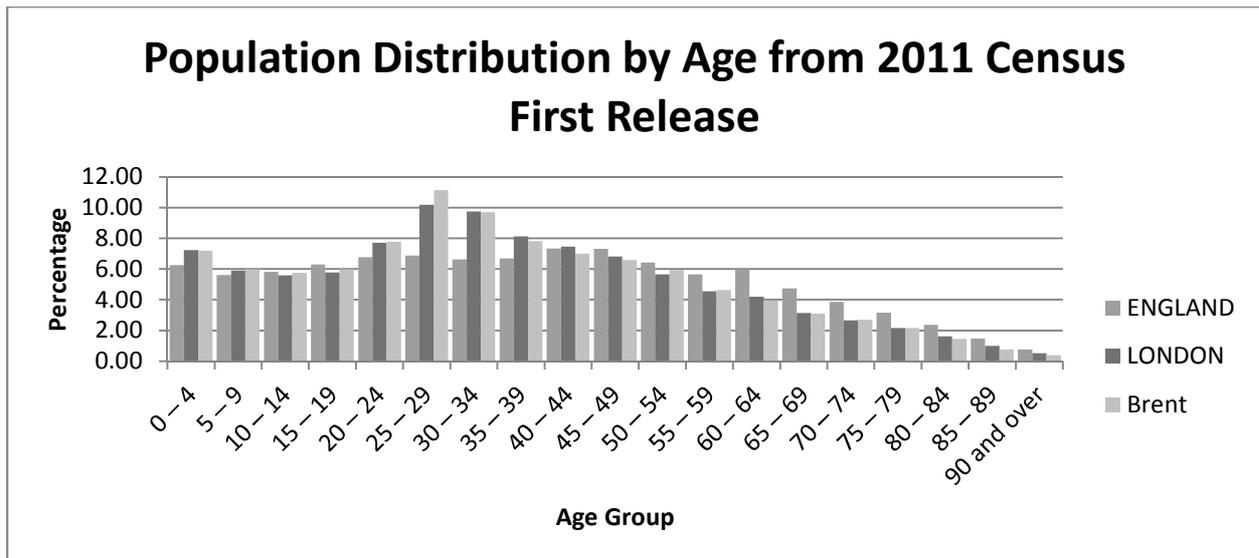


Figure 4

This does indicate that the residents of Brent, living in more deprived areas than London as a whole, may be impacted more by the proposed changes, but it must be stressed that there is no evidence whatsoever that all those parking in Brent come from Brent (indeed, given the contiguous built-up areas surrounding the Borough this would be a somewhat unlikely assumption), and the only sensible way to approach the analysis is to look at the population of London as a whole where possible. This is important to do where possible as the population of London is shown to be substantially different in make-up from England as a whole, so the distinction is important.

#### **Requirements for cashless parking – effect on service users**

The requirement for the use of the cashless parking system is that the user must have both a mobile phone (this is not quite true as spaces can be pre-registered online or by a fixed phone line and apps are available for other mobile devices, however for convenient usage the minimum requirements can be considered as stated) and a bank account. As mentioned above it will be assumed that the user is also the owner/driver of the car. It should be noted that all three groups can be considered independent – while there is obviously no reason why car ownership or driving is dependent on having a mobile phone, or vice versa, it is perhaps not so obvious that there are still ways to own, run, and tax, a car without a bank account (by paying in cash at a Post Office); similarly a driving license can be acquired without a bank account (again by paying in cash at a Post Office); mobile phone users also need not have a bank account (if they are using a pre-pay top-up service that can be paid for in cash). This analysis will aim to determine what proportion of which groups may be excluded from using the cashless service, as any user already able to use the cashless service or ready and able to make the switch will be unaffected by the project. Those excluded will then find themselves subject to the increased charges.

This analysis does not consider those drivers who may be renting a car or using one as part of a car-club scheme, nor does it consider motorcycle riders.

Data exists that can help us to build a picture of individuals with these three characteristics, and even combinations of them with other shared characteristics. This does limit the ability of this analysis to determine the impact of the proposed change to the service, but can be used to indicate a range that the true impact should lie within.

As part of the project the cost of cash parking will be increased as an incentive to switch to cashless parking. This will impact most on those who cannot access the cashless service, but will also impact those who feel unable to access it. This latter group will be ignored as having chosen to do so, rather than being compelled, as little or no data exists on these individuals (examples could include those whom distrust an electronic method over a physical parking slip, or those who lack confidence in the security of details given to a contractor).

### **Project deployment and mitigation of effects**

A number of different mitigation methods will be built into the deployment methodology to minimise any adverse effects. These are as follows:

- Staggered introduction – the parking machines will be deactivated in stages over an extended period of time as the project is rolled out gradually, allowing the response to be monitored and adaptations applied to later stages
- Rapidly reversible deactivation – deactivated machines will not be removed, rather covered; should they need to be redeployed the covers can be removed and the machine reactivated at short notice
- Thinning out initially rather than complete deactivation – cash payment options through a reduced cash parking machine network will likely remain available in the short- to mid-term
- Adopting an alternative cash payment option – this has yet to be determined, and will depend on customer demand, location(s) of the alternative cash payment option and the available commercial options available within the marketplace. Further investigation into the possible options will be undertaken by officers during the implementation phase of this project
- Location-sensitive introduction – the decision to deactivate a machine will also take into account the proximity of locations that may be high-probability destinations for those least likely to be able to go cashless. Such locations are yet to be identified

Where available some mitigations specific to different disability groups will be used to further lessen the impact on these users, although it should be noted that any user who is registered as disabled will be eligible for a Blue Badge and exempted from any parking charges.

More general issues of mobility need to be considered because Brent currently operated under a zero observation time model – if an enforcement officer observes a vehicle without a current parking session a penalty charge can immediately be issued. This observation time will have to be increased to allow service users time to get to the nearest cash payment machine or outlet

which will not be as close as before. This will mitigate any impact for these users who will then have time to access a cash payment option and return to the vehicle before being issued with a penalty charge.

### Analysis – Car Drivers

The Department for Transport (DfT) conducts the National Travel Survey (<http://www.dft.gov.uk/statistics/series/national-travel-survey>), which collects information on the travel habits of the population. The most recently available statistics relate to the 2010 survey, which was made available in July 2011.

Information on persons in households with or without a car/van is presented and broken down by household real income quintiles, for Great Britain (DfT table NTS0704). Combining the groups to those without access to a vehicle or unable to drive, and all others (who do have access to a vehicle) gives figure 5 (please note that these figures have been aggregated from rounded figures). It shows how the proportion of individuals without access to a vehicle, or the ability to drive it, decreases as the real household income increases (this is the gross income equivalised using the McClements Scale). In the lowest real income quintile less than half of individuals have access to a vehicle and are able to drive, increasing to more than 6 in 7 in the highest quintile (it is around a two thirds overall).

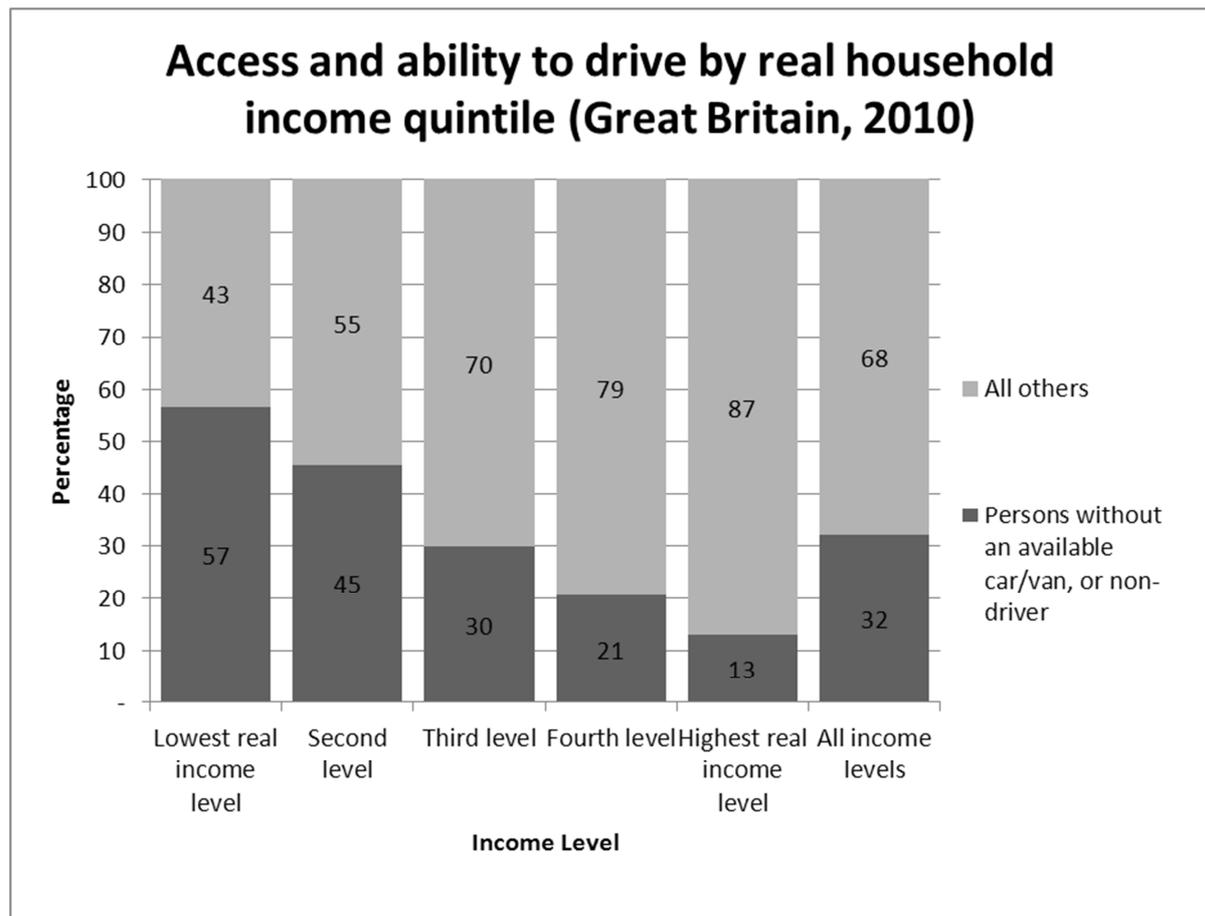


Figure 5

If we look at the proportions of households with no car or van, in figure 6 (based on data from DfT table NTS0703), then the differences are not as striking with around

half of households in the lowest quintile not having access to a car or van, dropping to only 1 in 11 in the highest quintile (for Great Britain the figure is 25%).

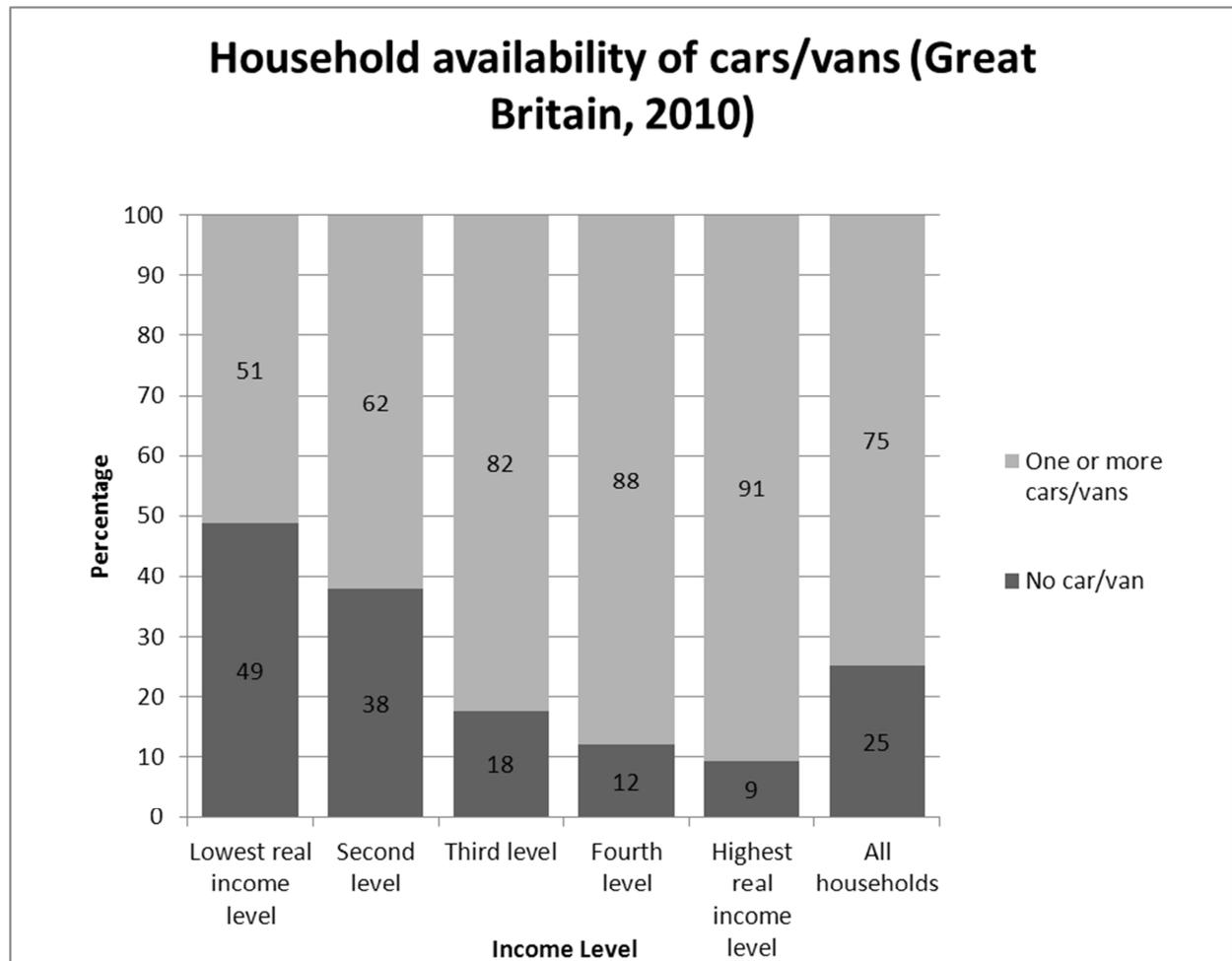


Figure 6

A comparison of the CACI PayCheck dataset for London and Great Britain shows that in both 2010 and 2012 datasets the distribution of equivalised household income was towards higher incomes across the board in London compared to Great Britain. This means that in London there is a smaller share of the lowest quintile nationally than an even national distribution would give, and a larger share of the highest quintile. The middle quintiles are about the same size in London as in the country as a whole. It should be noted that this does not take account of the effect of living costs on actual disposable income.

Figure 5 indicates that, if we assume individuals in the lowest and second income levels might find the increased cost of the cash option more of a drain on their resources, as the proportion of individuals in these groups who might actually be parking is much lower than in the middle and upper quintiles. Furthermore, the proportion of households this would affect is even smaller.

The survey also offers data by region, and DfT table NTS9902 indicates that the proportion of households without cars in London was 43%, much higher than the national 25%, despite the national income-based trend and London's generally higher incomes.

In DfT table NTS0201 there is data on the proportion of the population holding a full driving license, broken down by age and gender. This is shown in figure 7. The proportions of women and men holding a driving license is roughly the same in the 17-20 category (35%), but as the categories increase in age the difference between men and women widens until in the 70+ category whilst 78% of men have a license only 41% of women do. Overall, for those aged 17 and above, 73% of the whole population holds a license, made up of 80% of men and 66% of women. As proportionally more men are licensed to drive the proposed changes could affect them more, whilst looking at older people proportionally less hold licenses and so they will be less affected by the changes than younger people. DfT table NTS0206 looks at the availability of a car or van to adults in a household by gender and finds that, while 26% of men either have no access or are non-drivers, for women the proportion is 38%, adding further weight to this result.

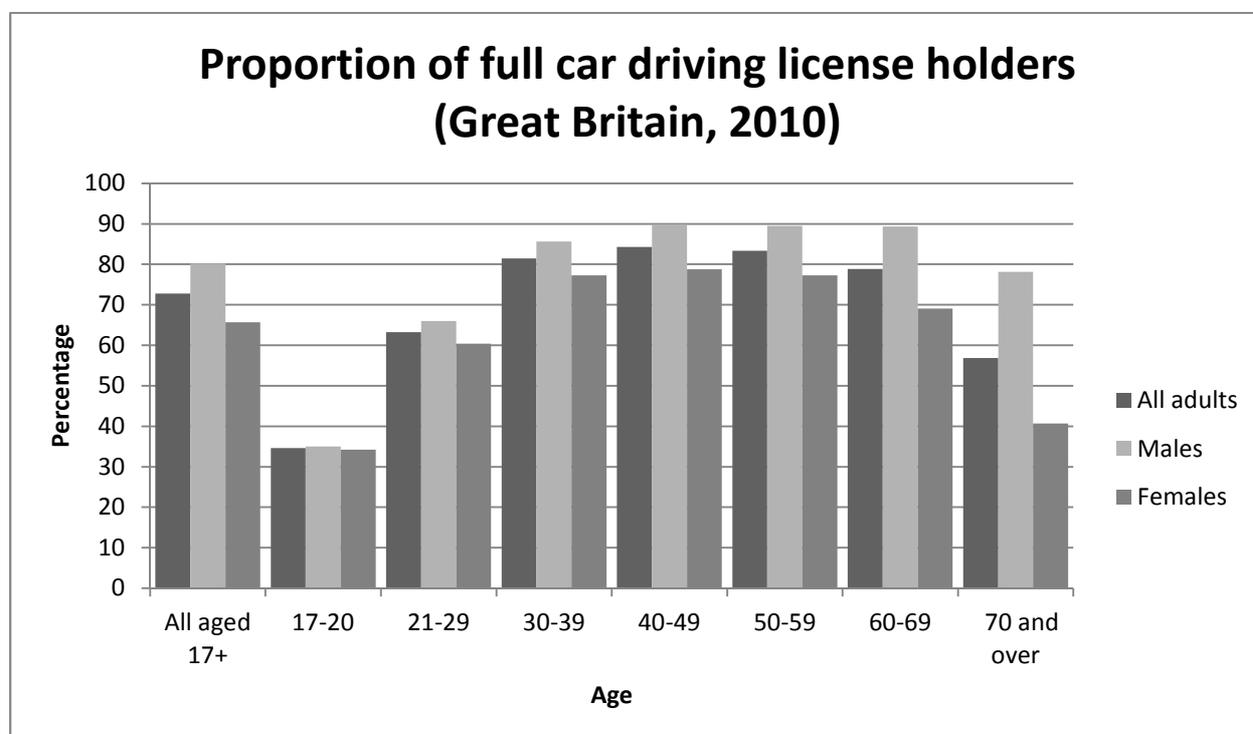


Figure 7

DfT table NTS0707 collates data on persons in households and their access and ability to drive broken down by various ethnic groups and subsets of these. This is displayed in figure 8. Comparing the proportions for White and the other ethnic group categories shows that they all (with the exception of White British) have higher proportions of individuals with either no access or no ability to drive a car or van, so the proposed changes will affect BAME groups less than White groups. Again the data has been aggregated from rounded figures.

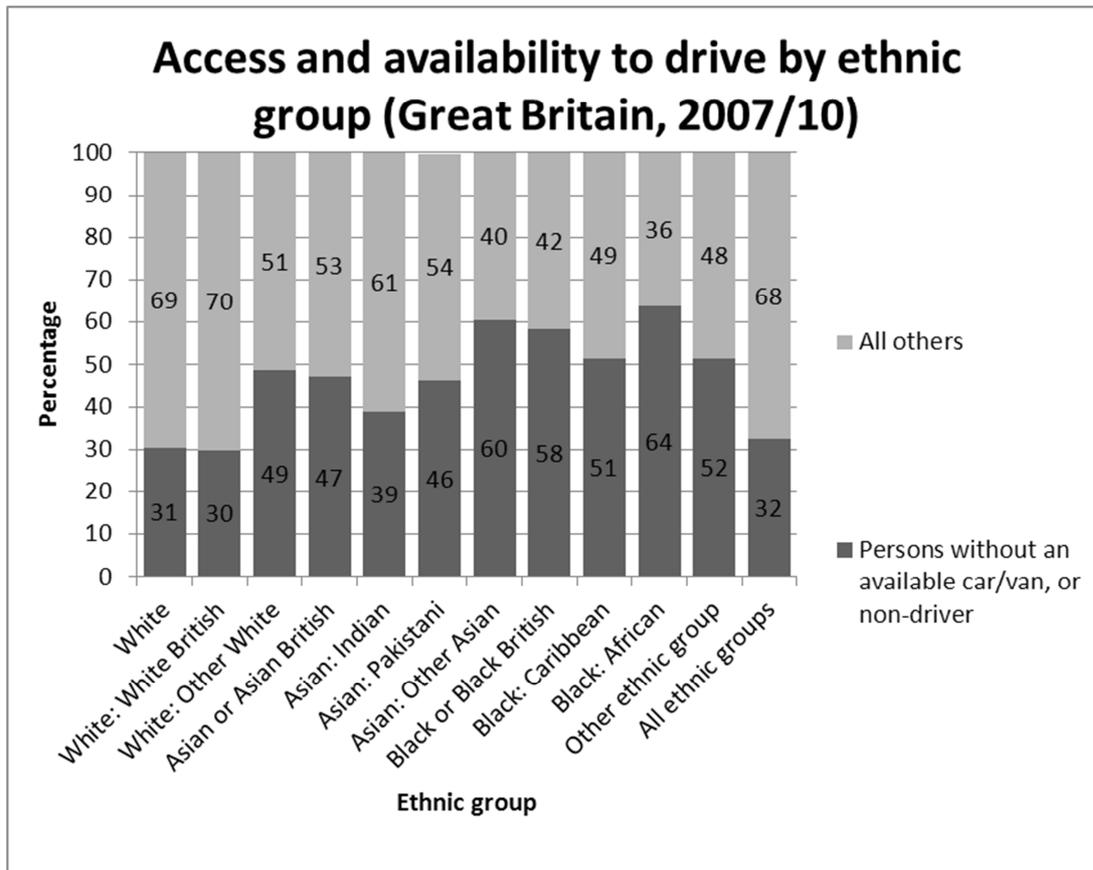


Figure 8

#### Analysis – Bank Account Holders

The Department for Work and Pensions (DWP) conducts the Family Resources Survey (<http://research.dwp.gov.uk/asd/frs/>). The results for the UK 2010/11 survey were released in June 2012. This includes data on those with or without bank accounts. It should be noted that individuals who refused to answer the questions on bank accounts in the survey will be included in the “having no account” groups in the following statistics.

DWP table 4.1 in the report states that 4% of households in London have no bank account of any kind (but not including the Post Office Card Account (POCA) which is specifically for the payment of benefits, etc. to the individual and cannot be used for cashless parking or indeed any transaction outside a Post Office.

In the same report table 4.2 examines household composition nationally. Households made up of a single adult (either male or female) are without a bank account (excluding POCAs) in 6% of cases, while the equivalent figure is 3% for households made up of two adults, and only 1% for those of three or more adults. Similarly in households with children, those with only one adult are without a bank account (excluding POCAs) in 6% of cases, dropping to 2% for 2 and 3 or more adults. A different breakdown of households indicates that 4% of households containing one or more pensioners has no bank account (excluding POCAs), whilst the figure is 6% for households with one or more disabled adult, and 5% for households containing one or more unemployed adults.

Another table in the report (4.3) considers the age of the head of household nationally, and the data is presented in figure 9. The age groups are not all equally sized, but for most the proportion without a bank account (excluding POCAs) is 3 or 4%, however this is a little bit higher at 5% for the heads aged 75-84, and goes up to 7% for those aged 85 and over.

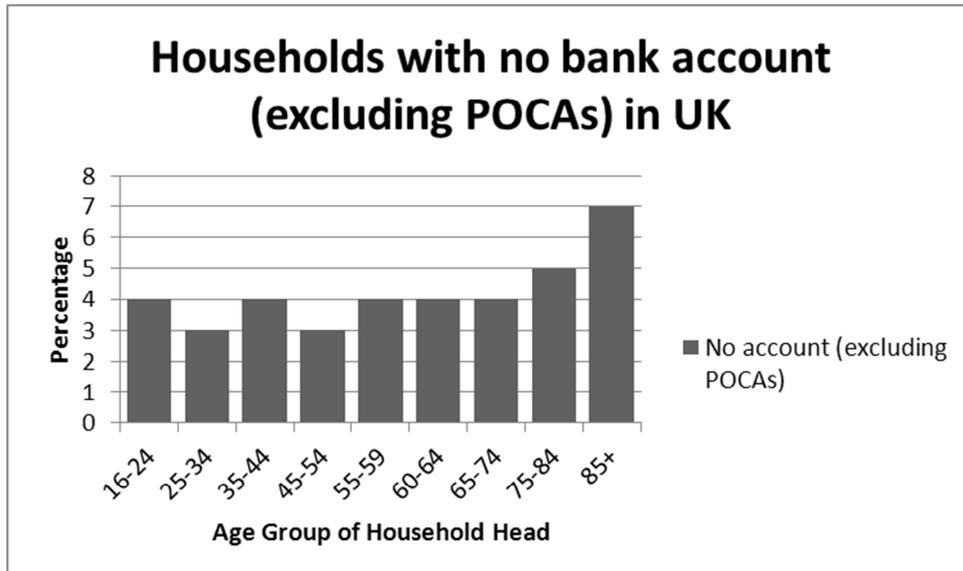


Figure 9

In the report table 4.4 considers the ethnicity of the head of household, and the proportions are a little more variable. The data is presented in figure 10. For the White ethnic group 4% of households are without a bank account (excluding POCAs), while the majority of the other ethnic groups are between 6 and 7%, with the highest being the Black Non-Caribbean group at 8%.

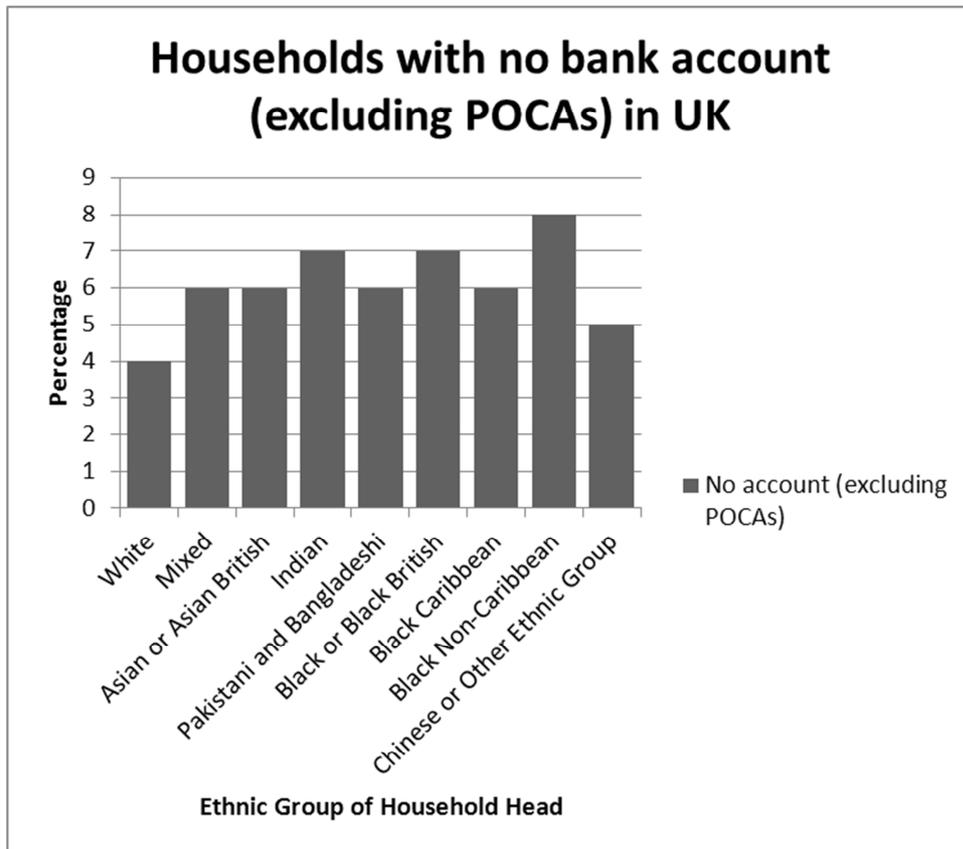


Figure 10

The report also breaks the figures down by benefit unit (defined as a single adult, or married or cohabiting couple, with or without children, in receipt of some form of benefit, which ranges from JSA, Attendance Allowance, Council Tax Benefit, to the Retirement Pension) in table 4.5. Over all benefit units the proportion with no bank account (excluding POCAs) is 6%, but for most family types the figure is 2 to 4%, exceptions being single male or female pensioners with 6%, single adults with children at 6%, single males without children at 10%, and single females without children at 8%.

Again looking at benefit units the DWP table 4.6 examines their economic status. For those units with at least one adult in full- or part-time work the proportions are 2 to 4% without a bank account (excluding POCAs), but for workless units where one or more are aged 60+ the figure was 6%, for workless units where one or more are unemployed the figure is much higher at 12%, and the highest was for workless units that were inactive with 15%.

Considering all adults, DWP table 4.7 looks at gender and age. This is presented in figure 11. While for most age groups, for males, females, or all adults, the proportion was 5% without a bank account (excluding POCAs). However, for all adults considered independent of age the proportion was 6%, including when broken down by gender. The main exceptions were the younger group 16-24, where the males had a proportion as high as 10%, females 8%, and all adults 9%, and 85+ where males were only a little higher than most at 6%, the females higher still at 7% along with this age group in general.

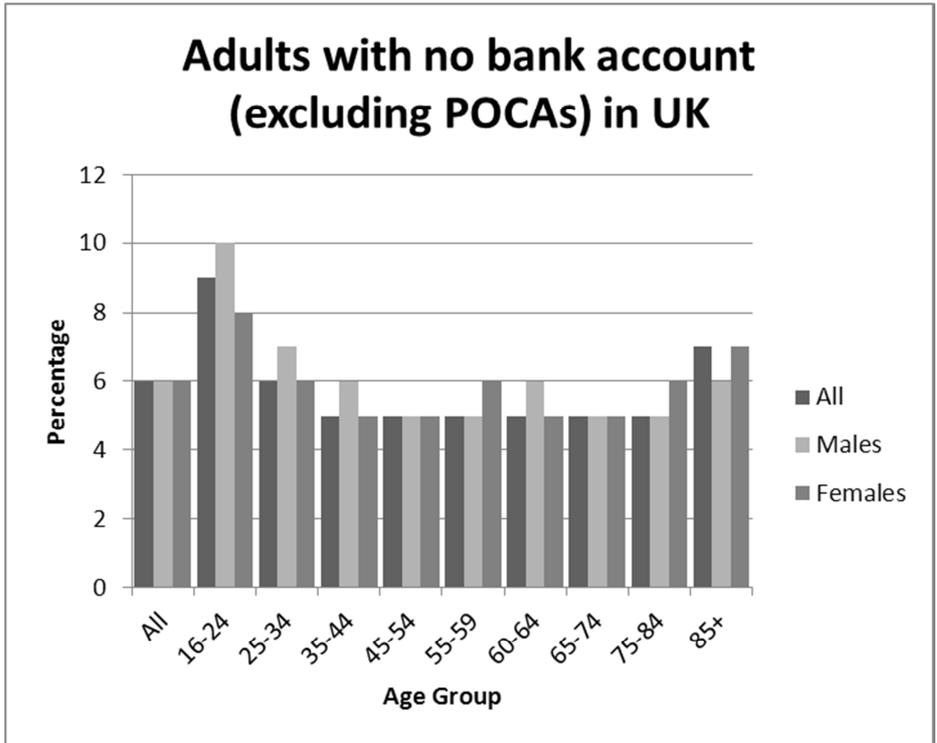


Figure 11

Household income is considered by this report, in DWP table 4.8, although as this relates to a pre-tax unequivalised figure it cannot be directly compared with other income data in this analysis. The data is presented in figure 12. Above a weekly income of £500 (£26,000 annually) 2% or less have no bank account (excluding POCAs), but below this the proportion without increases to 11% for those on less than £100 weekly (£5,200 annually).

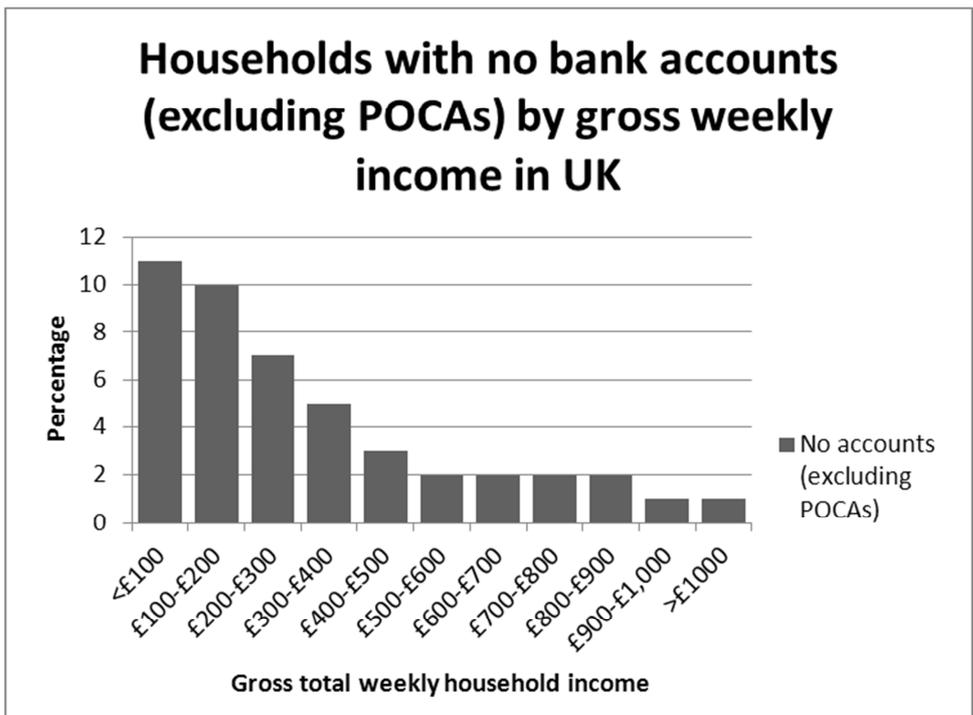


Figure 12

This survey also provides a breakdown of the weekly income of households in the UK by ethnic group, which is displayed in figure 13. The distributions of weekly incomes vary quite a lot across the different groups displayed. Compared with the White group Asian or Asian British, and Indian groups have generally higher household incomes, while the Mixed, and Chinese or Other Ethnic Group groups are broadly similar (although for those in the latter the proportion in the lowest income category of <£100 was significantly higher), and the Pakistani and Bangladeshi, Black or Black British, Black Caribbean, and Black Non-Caribbean groups have generally lower household incomes.

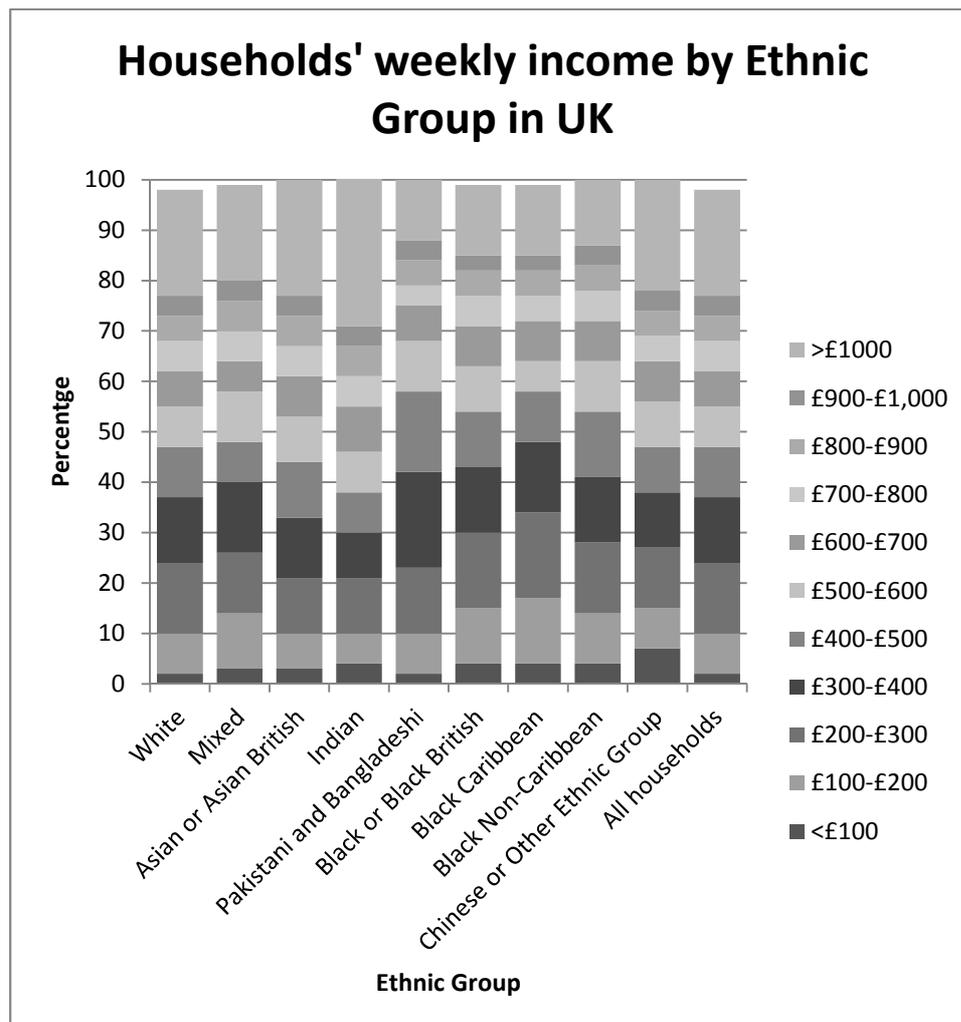


Figure 13

In general the vast majority of people have a bank account that could be used for the cashless parking; however, certain groups have significantly more likelihood of not having one, including the older people, certain ethnic groups, younger people, and those with a very low income. Some household or family structures are also more likely to have no suitable account. There is also evidence that although some ethnic groups have proportions with generally higher household income than the White group, there are also some with lower incomes, which will leave these groups more exposed to the increased costs for cash payment, if they can't utilise the cashless option.

## Analysis – Mobile Phone Users

Although MOSAIC has indicators on the likelihood of their demographic groupings to use the phone to pay for services this information is not in a form that can be extracted for this analysis as it is too closely tied to all the other factors that MOSAIC includes to be untangled. The source given is the TGi survey (<http://kantarmedia-tgigb.com/>), however access to the results of this survey is currently not available to the Council.

OfCom releases a report covering various topics within its remit, including research into the users of mobile phones. The most recent of these is the Communications Market Report 2012 ([http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr12/CMR\\_UK\\_2012.pdf](http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr12/CMR_UK_2012.pdf)) which includes the statement that for the UK “the proportion of adults who personally own/use a mobile phone is 92%,” and in England the figure is 93% (this is also the figure for urban England).

The report quotes figures on mobile phone take up amongst different age groups in the UK from their own research in Q1 of 2012. Their figures include mobile only and fixed and mobile [phone service] figures and it should be noted that the data displayed in figure 14 is the aggregation of these rounded figures, and they represent the percentages of adults who live in a household with access to a mobile phone. For the age groups up to 54 then 98-99% of adults have access to a mobile phone, however from 55-64 this drops to only 94%, for 65-74 it is 89%, and for 75+ the figure is as low as 62%.

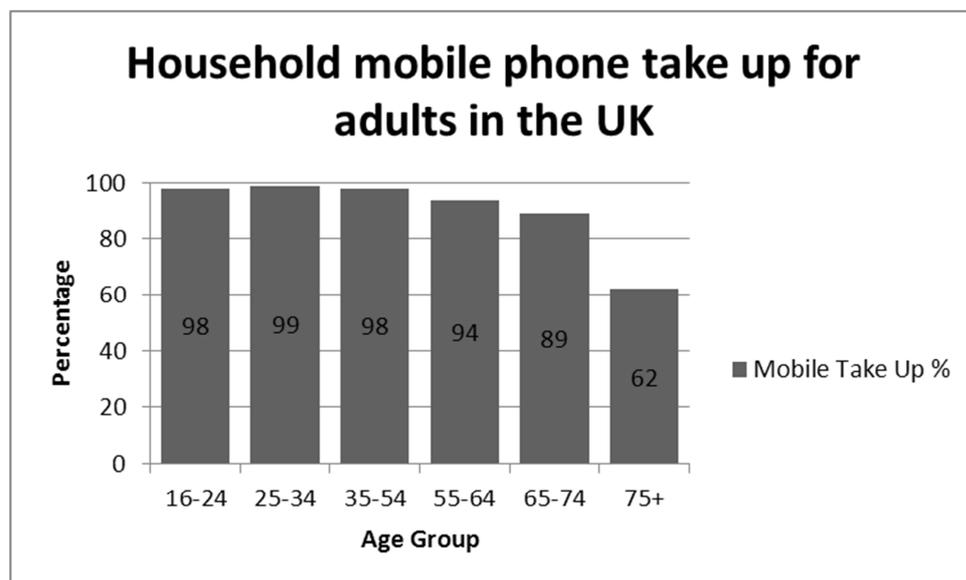


Figure 14

The report also includes figures on personal ownership of a mobile phone broken down into slightly different age groups. These tell a similar story with those below 54 having 97-98% mobile phone ownership, while for ages 55-64 91% have a mobile phone, dropping to only 68% for 65+. These figures are presented in figure 15.

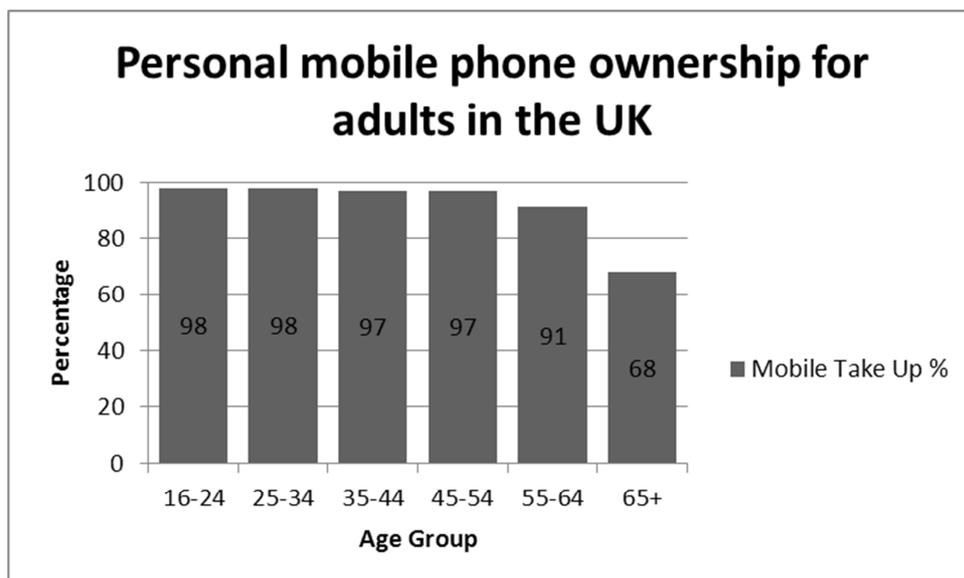


Figure 15

The report also shows the household take up of mobile phones by socio-economic group (NRS grade). The proportions of respondents to their Q1 2012 survey in different socio-economic grades in households with a mobile phone were in ABC1 97%, in C2 96% and in DE 87%. These figures were arrived at by aggregating rounded figures for mobile only and fixed and mobile [phone service] households. In this socio-economic classification A represents upper-middle class through to D representing working class, with E representing those at the lowest levels of subsistence (upper class has no representation on this scale). This classification framework is laid out by the National Readership Survey (<http://www.nrs.co.uk/lifestyle.html>), known as the NRS, and they give the following information:

		% of population (NRS 2010)
A	Higher managerial, administrative and professional	4
B	Intermediate managerial, administrative and professional	22
C1	Supervisory, clerical and junior managerial, administrative and professional	29
C2	Skilled manual workers	21
D	Semi-skilled and unskilled manual workers	15
E	State pensioners, casual and lowest grade workers, unemployed with state benefits only	8

On the same web page they describe the strong correlation between the NRS social grade and the income of the Chief Income Earner in the household (it is this person who determines a households NRS grade, although individuals in the household can also be given their own grade).

All in all mobile phone take up is in the high nineties for most individuals (either personally or by being in a household with a mobile phone), with only 65+ age groups having a significantly large proportion without (around 1 in 10 65-74 and

roughly a third 75+). The same is true looking at socio-economic grades, where even the two lowest grades combined have 7 out of 8 having a mobile phone).

### **Correlated or Uncorrelated?**

While the above information is very useful in investigating how each of the three important characteristics are distributed amongst the population unfortunately none of them are tied together. It is impossible to say whether those individuals without a bank account are more or less likely than those with a bank account to be mobile phone users. The same is true of the combination of car drivers and either of these two factors.

Worst and best case scenarios could be calculated where similar classifications exist, with the best being that no-one who drives lacks either a bank account or a mobile phone (so all drivers can use the cashless parking, leaving only considerations of language or other impairments necessary) and the worst being that of the drivers there is no overlap between those with no bank account and those with no mobile (making the group who cannot use cashless parking and are therefore subject to the extra charges as large as it can be).

Instead it may be more useful to consider that, in the case of income or socio-economic group, those in the lowest group may not be able to afford a car and therefore would not be affected by any changes to parking. It is perhaps more the middle-income groups who will be most affected, particularly where they are of the groups who are less likely to own a mobile phone.

### **Increased Charges**

Any increase in charges to encourage a move to cashless parking is going to disproportionately affect those on lower incomes, for whom the parking charge will use up a greater proportion of their income. This assumes that they spend equivalent amounts on parking to everybody else, which may not be true, but no suitable data is available on the parking habits of individuals.

### **Location**

As can be seen in figure 16 parking machines are not distributed equally around the borough. They are concentrated in CPZ areas (not shown), with a few additional locations outside of these in car parks or other "town centre" pay and display on-street parking areas. In some locations they are exceptionally densely packed with parking meters on opposite sides of the road. This is generally determined by the number of parking spaces they are serving.

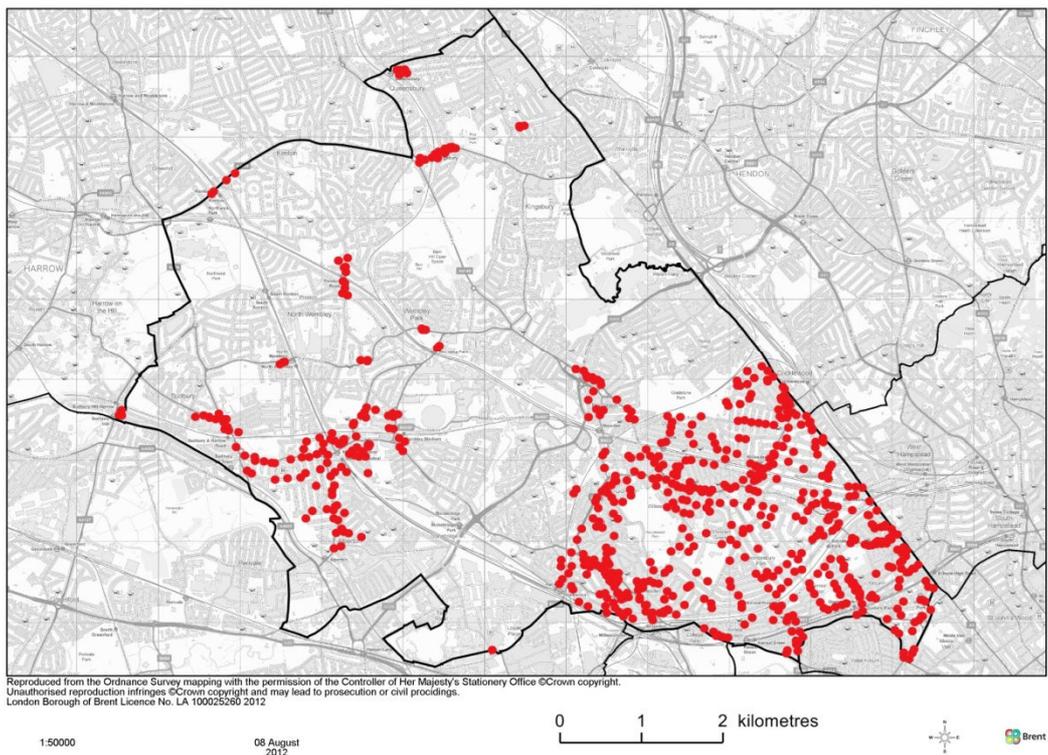


Figure 16 – Parking meter locations in Brent

Appendix B – Example communications



**P**ark **Online**

it's e-easy

Renew a permit  
Pay a fine  
**Instant and secure**



**Brent**

[www.brent.gov.uk/parking](http://www.brent.gov.uk/parking)