

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Authority to Award Contracts for Parking & Traffic Civil Enforcement and Cashless Parking Services
DEPARTMENT:	Regeneration and Environment
TEAM:	Healthy Streets and Parking
LEAD OFFICER:	Sandor Fazekas
DATE:	30 th November 2022

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

N.B. This document relates to the Equalities Impact Assessment carried out on 12th July 2021 for the overall Redefining Local Services (RLS) Programme, taking into account any new and relevant developments relating to the decision on the Final RLS Delivery Model.

The Redefining Local Services (RLS) Programme aims to design and implement a better, more integrated and flexible local services delivery model that improves the look and feel of Brent's public realm. The following RLS programme objectives were defined by Brent's members following the launch of the programme in May 2019.

The RLS programme's scope covers a number of functions led by the Environmental Services Directorate, which are currently outsourced, including the provision of Parking services. All parking services are outsourced, with the exception of the Client, Policy, and Projects functions.

Following Cabinet approval on 7th February 2022 to tender for the provision of Parking Services, this assessment is made in relation to a further Cabinet report for the Authority to Award Contracts for the Provision of Parking and Traffic and Cashless Parking Services, following an extensive procurement process.

The new Parking and Traffic Civil Enforcement Contract will be let using the British Parking Association (BPA) model contract (with some minor amendments to meet Brent requirements), the industry standard. The new Cashless Parking contract will be let as a specialist Software as a Service (SAS) contract.

These services are defined in the table below:

Contract	Services	Tender Route
<i>Parking and Traffic Civil Enforcement Services</i>	<ul style="list-style-type: none"> • Premises – Base for contractor operation • Premises - Vehicle pound • Vehicles supply and maintenance – CCTV cars / Removal Lorries / Civil Enforcement Officer (CEO) transport / Mopeds • On-Street enforcement (CEO deployment) • Vehicle Removals and relocations • Reporting Signs and lines maintenance • Blue Badge enforcement • Persistent Evader management • Event Day management (Wembley Protective Parking Scheme) • Safe School Streets enforcement • Low Traffic Neighbourhoods enforcement • Bay suspensions enforcement • CCTV - Moving Traffic enforcement & ANPR • Car Parks enforcement • Car Parks management (inc. opening/closing) • Pay and display cash collection and banking • Pay and display – maintenance 1st line • Pay and display – machine provision (quotes with option to/not to procure) • Permits Administration (staff) • Call handling for general enquiries • Suspensions and dispensations administration • IT support – administration of PCNs, Handheld devices and Permits 	<i>Restricted</i>
<i>Cashless Parking</i>	<ul style="list-style-type: none"> • Cashless Parking (virtual pay and display) • Permit System 	<i>Restricted</i>
<i>IT System</i>	<i>Integrated central parking IT system (including suspensions module). This is used for issuing PCNs (Taranto)</i>	<i>Direct award contract until 31st December 2025 to mitigate risks</i>

For the Parking and Civil Enforcement Contract, three large providers submitted bids, and the recommendation is to award to Marston Holdings Ltd, one of the largest Civil Enforcement providers in the country with 55 Local Authority Contracts, 10 of which are in London.

There were two of the largest providers that bid for the Cashless Parking contract and the recommendation is to award to Pay by Phone Ltd, the largest provider in the UK with contracts with 19 London boroughs.

2. Who may be affected by this policy or proposal?

The Parking Policy 2020 sets out our approach to provide effective parking management in the borough which is an important tool that can contribute towards achieving the Council's wider transport, economic and planning policy objectives, including the Council's Long Term Transport Strategy 2015-2035, Climate and Ecological Emergency Strategy 2021-2030 and new Air Quality Action Plan for 2023.

We strive to make Brent a safer borough in which to drive, improve motoring standards, reduce traffic congestion, and contribute to reducing carbon emissions.

Due to the wide-ranging nature of the Parking services these will be used by residents, businesses and visitors to the borough and have the potential to impact on everyone in the borough, including council and contractor employees tasked with delivering the services.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance. The legal duty is set out at Section 149 of the Equalities Act 2010.

Under s.149, public bodies such as council's must, in the exercise of their functions, have "due regard" to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a "protected characteristic" and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

The equality duty arises when the council is deciding how to exercise its duties and powers regarding future arrangements for the provision of Parking Services.

In addition to the Act, the council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission, and to comply with TUPE regulations relating to the potential transfer of staff.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex	X		

Race	X		
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

In conducting this analysis a variety of data sources were considered, primarily to develop an understanding of the borough's demographic profile both now and in the future. This has helped identify potential impacts to protected characteristic groups and areas of expected demand.

A list of sources considered is included below:

Brent Open Data

- Equality Profile of Brent (2019)
- Population Change in Brent (2019)
- Brent JSNA Indices of Deprivation (2019)
- Brent Resident Attitudes Survey (2018)
- Air Quality Brent JSNA 2019/20

Brent Resources

- Brent Inclusive Growth Strategy (2019 - 2040) and IGS Research Base

Other

- ONS Mid-Year Population Estimates (2019)
- The Mayor for London's: A Safer City for Women and Girls Strategy (2018 – 2021)
- WHO Report: Air Pollution and Child Health: Prescribing Clean Air (2018)

A summary of the key findings from this research is included below:

A growing population –

The population of Brent increased by 27% between 1998-2018. Projections indicate that this pace of growth is set to continue: the population is expected to rise by a further 25% by 2041, faster than the London average (22%) and more than double the England average (10%). If realised, this would equate to an additional 84,800 residents by 2041.

A young, but ageing population –

Brent has a relatively young population. In 2018, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, England). However, in line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, 12% by 2041 (+8,600 children).

Disability –

Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

Race –

Almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent’s largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson’s Diversity Index).

Sex –

The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-34 age group where they comprise 54% of the population. In contrast, women make up a higher proportion of the Borough’s elderly population: 62% of those aged 85 and over are female.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	<p>Positive</p> <ul style="list-style-type: none"> • Effective parking management supports sustainable travel and therefore carbon reduction. Studies have shown that air pollution affects children aged under five in uniquely damaging ways. Brent has a higher proportion of children aged under five (8% - estimated 28,797) compared to the rest of the UK (5%), and while overall air pollution in Brent is declining, there remain several air quality hotspots in the Borough. <p>There is a commitment for the Parking and Civil Enforcement contract Social Value to aim to transition to a fully electric fleet by year 2 and reduce travel and Carbon emissions by 2030. The Cashless Parking contract includes contributing 30 trees per annum to the Brent Sponsor a Tree fund.</p> <ul style="list-style-type: none"> • Vulnerable residents, particularly those in older age groups and those with disabilities or long-term health conditions, are known to be more reliant on the services provided by the council and will stand to benefit from improvements to Parking services. It will also

be important to ensure that services aimed specifically at these groups are maintained. This is important, as although Brent has a relatively young population now, the number of residents aged 65 and over is expected to increase by approximately 85% through to 2041.

- The Resident Attitudes Survey (2018) suggests that 66% of those who disagreed with the statement that ‘the Council is easy to contact for help and information’ were from the 55 and over age group. In addition, a significant proportion of individuals who expressed an aversion or inability to use online services were identified to be from the 65 and over age group, as well as those with disabilities and long-term health conditions. There is an opportunity, therefore, to improve the accessibility of council services for these vulnerable groups and others. We are aware that some older residents find the use of technology more challenging, and the new Cashless Parking contract includes the following:
 - As part of the Social Value commitment, support the Councils Digital Strategy 2022-26 and efforts to reduce digital exclusion and the provision of laptops to those in most need through the Resident Support Fund, Brent’s Living Room, and the Refugee Support. They will support the donate your device campaign for one month per year through the app and social media donating 5 devices per year. They will work with the Council, Age UK and Elders Voice to agree the content of Digital Inclusion workshops to maximise their effectiveness. The Digital Inclusion workshops will help Brent Residents learn how to use a smartphone, download apps and make payments for everyday services such as parking.
 - 24/7 live agent support and online tutorials through short YouTube videos showing how to use all aspects of the service.

DISABILITY	
Details of impacts identified	<p>Positive</p> <ul style="list-style-type: none"> • Around one-in-seven (estimated 46,168) Brent residents have a long-term health condition or disability that limits their day-to-day activities. In addition, of the 23% (486) respondents to the 2018 Resident Attitudes Survey who conveyed that they do not get enough social contact or feel socially isolated, 37% (180) also had a long-term disability. This statistic is likely to have been exacerbated by the pandemic. <p>Improvements to the accessibility of the services provided would have a positive effect on this group:</p> <ul style="list-style-type: none"> ○ Systems for cashless parking services are designed against the background of the W3C Web Content Accessibility Guidelines and to be accessible to individuals with a range of disabilities. <p>Arrangements to support impairment or learning disability include:</p> <ul style="list-style-type: none"> ○ All agents are native English speakers and fully trained in assisting all motorists including those who may be deemed vulnerable through any protected characteristics as set out in the Equalities Act 2010. ○ Motorists who find it very difficult to use telephone keypads can simply ask our customer care agents to register an account and/or start a session on their behalf. ○ Customers with hearing impairments will benefit from the simplicity of SMS texts and downloadable apps. ○ Near Field Communication (NFC) technology for payments, which can be a welcome solution for many customers.
RACE	
Details of impacts identified	<p>Positive</p> <ul style="list-style-type: none"> • Brent is home to many communities and is one of the most diverse Boroughs in London; almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic (BAME)

groups. A key objective of the RLS programme was to engage with all members of the community in shaping the future service arrangements, to ensure that they meet their needs and aspirations. This can be achieved through consultation with residents regarding future decisions on service provision. Another key objective is ensuring that local people and businesses are able to benefit economically from the services that we provide, which stands to benefit all BAME groups, particularly with regards to recruitment and equal opportunities. This can be achieved through careful consideration of social value offers put forward by bidders in any re-procurement, to ensure that they benefit these groups.

In relation to the Parking and Traffic Civil Enforcement Contract there is a Social Value commitment to:

- Local employment and a minimum of 14 apprentices per annum.
- Improve the gender pay balance across the company and for Brent residents and increase the female workforce.

Due to Brent's diverse composition, there may be a language barrier preventing some households from utilising services properly. For the Cashless Parking services Specific arrangements for multilingual support include:

- 24/7 live agent support and online tutorials through short YouTube videos showing how to use all aspects of the service.
- A website that supports over 300 languages and a phone app that is available in 11 languages.
- Capability of a call centre to handle over 21 European languages for both oral and written communications, and Arabic.
- Access to a translation services company, Languageline which offers a translation service for correspondence and interpreting services for calls in 170 languages, such as Gujarati, Hindi etc. It takes around 30 seconds to obtain a translator who participates in a three-way call with a non-English speaking caller.

SEX	
Details of impacts identified	<p>Positive</p> <ul style="list-style-type: none"> • The Mayor of London's 'A Safer City for Women and Girls Strategy' (2018 – 2021) highlights the disproportionate nature of the personal safety issues experience by women and girls in London. Contributing to the safety and security of the Borough's residents in a targeted way, through seeking a neighbourhood approach to managing crime and ASB hotspots and involving the local community in the monitoring and reporting of issues to increase natural surveillance. <p>The dispatchment of Civil Enforcement Officers from 2 local bases in the borough stands to benefit this group of people.</p> <p>In relation to the Parking and Traffic Civil Enforcement Contract there is a Social Value commitment to:</p> <ul style="list-style-type: none"> ○ Improve the gender pay balance across the company and for Brent residents and increase the female workforce.
SEXUAL ORIENTATION	
Details of impacts identified	Neutral
PREGANCY AND MATERNITY	
Details of impacts identified	Neutral

RELIGION OR BELIEF	
Details of impacts identified	None
GENDER REASSIGNMENT	
Details of impacts identified	None
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	None

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Targeted consultation on the RLS Delivery Model Options to comply with Section 3 LGA 1999 took place from 17 May to 28 June 2021.

In total, 125 responses were received via the online consultation portal over the six week period. Of these:

- The largest group of respondents by ethnicity were White British (32%) and Indian (19%), although 20% preferred not to state their ethnicity. There was a noted under-representation from Black British and Eastern-European groups for this consultation, with more targeted communications required for these groups in any future consultation exercises.
- The majority of respondents by age were in the 45 years and over categories, accounting for over 62% of respondents. This is compared to 23% of respondents who identified as being in the 44 and under categories. These lower age groups will need to be targeted for future consultation.

Two focus group sessions were also carried out with residents, businesses and the local voluntary sector. The second of these sessions included a representative of Brent Mencap.

There is no further engagement required.

5. Please detail any areas identified as requiring further data or detailed analysis.

It is envisaged that any potentially adverse equalities impacts are more likely to stem from future decisions relating to service provision and policy. Specific equalities implications and the means of mitigation resulting from any such decisions will, therefore, need to be considered at the appropriate point in the development of these decisions. However, contract monitoring arrangements will include an analysis of customer satisfaction and identifying opportunities for future improvements.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

If any potentially negative issues are to be identified in consideration of additional data, the council will give due consideration to the specific needs identified and how best to incorporate mitigating measures in order to maximise equality.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

The conclusions drawn from this Equalities Analysis will be used to monitor the impacts of award of the contracts for Parking services on protected characteristic groups. Any adverse impacts identified will be carefully considered and mitigating and monitoring measures built into the performance framework for those contracts to ensure that they are acted upon.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

An analysis of the potential equalities impact on the decision to award contracts for the provision of Parking and Traffic Civil Enforcement and Cashless Parking Services has been carried out, concluding that there are likely to be only positive or neutral impacts on protected groups. The new contracts provide the opportunity to improve the level of service currently provided. There is no evidence at this stage, to suggest that there will be any negative impact arising from these proposals.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Conduct supplementary Equalities Analysis focused on service provision as and when they are developed.	Identify emergent equalities concerns based on service specific data that may not have been identified	Sandor Fazekas or relevant officer	TBC
Ensure that Quality and Social Value commitments are delivered by the new Parking services providers.	Establish KPIs and monitoring arrangements to ensure that commitments are delivered. Potential emergent equalities concerns from the community could be identified and mitigating actions put in place.	Sandor Fazekas or relevant officer	3 July 2022

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Sandor Fazekas	28.11.2022
REVIEWING OFFICER:	Angela Chaudry	30.11.2022
HEAD OF SERVICE:	Sandor Fazekas	01.12.2022