

Equality Impact Assessment:

Initial assessment

What are the proposed outcomes of the policy?

It is proposed to replace the current paper based parking permit system, which is administered at the Cash Office, with an online e-permit system. Currently, customers have to visit the Cash Office to apply and purchase their parking permits. The Cash Office then record the purchase on their parking system which each evening updates the enforcement system used by the Prevention and Enforcement Service (PES).

The proposal is to replace the Cash Office with an online portal accessed through the council's Digital Services Hub (DiSH) MyAccount. The online e-permit portal being proposed has a real time link with the enforcement system in order that the PES has an up to date list of all valid permits. Customers will be able to go online via various devices (e.g. Smartphones (Apple and android), PCs, tablets, laptops, etc) or at one of the community hubs being developed through the council's CommunityServe Programme across the city (e.g. Herlington Centre, Cross Keys in Westwood and Gladstone Park) to apply, activate and pay for their permits. The council are also developing community hubs at its libraries (currently, only available at the Central Library) where customers will be able to go online and scan documentation.

The scope of the e-permit system would include residential, visitor (including visitor scratch cards) and business parking permits for the Restricted Parking Zones (RPZs) across Central, Park, East, Fletton, Stanground, Woodston and North Wards, plus season tickets for council car parks, market traders and staff occasional permits.

Although the outcome is provide parking permits as a wholly online service, the council recognises that some residents will not be able to access the internet or pay online. In exceptional circumstances, the council will operate a postal permit service issuing physical permits. This system will be monitored and regularly reviewed to ensure that it is not otherwise used and that it meets the needs and requirements of the customer.

Which individuals or groups are most likely to be affected?

There is no data collected on the customers who apply and purchase parking permits. However, the RPZs operates in wards with a higher population density than the city average. These wards tend to have a more youth profile than the Peterborough average, but a greater number of people who are from an ethnic group other than white, with the exception of Fletton and Woodston. These wards are also amongst the most deprived in Peterborough, experiencing lower levels of full and part-time employment, but also lower levels of unemployment.

It is recognised that the groups most likely to experience a negative experience due to the e-permit system are the elderly, people with a disability and those who can't afford to be digitally active and online, i.e. the digitally excluded or digitally dismissive.

Now consider whether any of the following groups will be disproportionately affected:

Equality Group	Note any positive or negative effects
Particular age groups	Adverse impact is probable or certain for certain

	<p>groups, but the policy as a whole can nevertheless be justified.</p> <p>National (UK) data shows the percentage of people who have never used the internet significantly rises from the age of 65. This group of people have traditionally relied on paper based information. However, the national figure for 16-24 year olds who have never used the internet is only 0.7% of the UK population. Therefore, there is a positive impact as a result of being a young person, as this age group tend to want to transact on the internet and specifically on mobile devices.</p> <p>This will have a negative impact for those, specifically older people aged >65, who cannot easily access the internet. These people will feel digitally excluded and anxieties could increase. However, it has a positive impact for those who have internet access and are digitally capable.</p>
Disabled people	<p>Adverse impact is probable or certain for certain groups, but the policy as a whole can nevertheless be justified.</p> <p>Some Mental Health conditions give rise to short attention, concentration or anxiety issues when presented with official forms or carrying out business in a new way. Expectation to contact the council and complete forms by digital means may increase anxiety for some.</p> <p>Customers with mobility challenges may not have internet access at home, therefore, would be negatively impacted because they are reliant on paper-based documentation. However, for those with mobility issues who do have internet access, this change will be beneficial.</p> <p>For people who are visually impaired the council website does have a contrast and accessibility tool. However, each platform will need to be reviewed to establish what facilities are in place for visual impairment.</p> <p>For customers with hearing impairment improved, digital service availability is an improvement.</p>
Married couples or those entered into a civil partnership	Adverse impact is unlikely, but positive impact is also unlikely.
Pregnant women or women on maternity leave	Adverse impact is unlikely, but positive impact is also unlikely.
Particular ethnic groups	Adverse impact is probable or certain for certain groups, but the policy as a whole can nevertheless be justified.

	<p>The following languages: Polish, Czech, Slovak, Portuguese and Lithuanian are the most prevalent users of translation services. These languages are consistent with the top five languages in the School Census data for EAL children. There is also impact for the Asian population where their first language is not English. Whilst the website has a translation tool each individual platform does not have a language solution.</p> <p>With regards to people whose first language is not English, current forms and online services are not published in other languages, and the Cash Office do not provide any translation services and, therefore, the disadvantage is no greater or less than the current situation. However, Google translate can be used on the website and Community Connectors are available at the community hubs to support people whose first language is not English.</p>
Those of a particular religion or who hold a particular belief	Adverse impact is unlikely, but positive impact is also unlikely.
Male/Female	Adverse impact is unlikely, but positive impact is also unlikely.
Those proposing to undergo, currently undergoing or who have undergone gender reassignment	Adverse impact is unlikely, but positive impact is also unlikely.
Sexual orientation	Adverse impact is unlikely, but positive impact is also unlikely.

What information is available to help you understand the effect this will have on the groups identified above?

The permit system will be able to analyse the profile of those customers who use the e-permit system and those that require physical permits as they can't access or complete the online system.

Who will be the beneficiaries of the policy?

Those customers who want an easier and more convenient way of applying, buying and activating their parking permits. The online system will provide flexible, cost-efficient services and save customers time whilst allowing for the customer to transact how, when and where they like.

The Council will also reduce cost in provision of the parking permits service.

Has the policy been explained to those it might affect directly or indirectly?

The Council will launch a consultation and a communications campaign on 11 July 2017 asking for comments on the proposed e-permit system. All residents in the RPZ will receive a letter explaining the proposed system and stating how they can comment. The results of the consultation will be presented to Cabinet on the 25 September 2017 in order to make an informed decision if to implement a entirely online service.

Can any differences be justified as appropriate or necessary?

The majority of the population are now digitally active and want to self-serve and, therefore, not interact with the council face to face. This is justified by national research and the fact that transactions at the Cash Office have declined by over 60% since 2008. Parking permits is one of a few services, including Taxi Licensing, where customers can only pay at the Cash Office. This in itself is restrictive especially when the Cash Office has restricted opening hours. Therefore, an online method is required to meet current and future customer needs.

Are any remedial actions required?

It is proposed that even though the council will promote a e-permit system, physical permits will still be issued to those with particular needs and requirements. The council will not actively publicise this approach. This paper based system will be a postal service. It is proposed that strict rules will be applied to this route to prevent the fraudulent use of physical permits.

However, it is recognised that for some vulnerable customers, a digital service can present challenges. For some, there is a lack of skill or confidence in using IT while others may not be able to afford the appropriate equipment. In order to help people to manage, the council has developed a number of services and put in established support, for example:

- continue to provide, and extend free access, to computers at libraries;
- promote access to computers available in the Community Hubs;
- promote access to computers available in other community facilities;
- map and promote existing digital assistance provided by other organisations, e.g. Barclays Digital Eagles scheme;
- map and promote free wifi hotspots in the city;
- promote recycled computer schemes in the city;
- for key digital services, provide accompanying videos detailing step by step how to use these services;
- include in any digital training, and promote staying safe using the internet;
- target family, friends and carers to support older people to use digital tools;
- continue targeting vulnerable people through digital inclusion, whilst also training someone in the community to also be able to deliver the training; and
- provision of digital “pop ups” at key locations in the community.

The council is committed to ensuring residents have the right support to adapt to digital technologies and wants to help residents to access online services, such as, making a payment. As more services become digital and some only available online, it is important to ensure that local residents are aware of the benefits of using the internet and have the relevant skills and confidence to do so. Since 2015, the council has delivered community based training around digital inclusion and attended a number of roadshows with partners where the council has pushed digital take-up to use services via the internet, including job centre events, digital inclusion week, ‘Q’ busting at Bayard Place, Axiom Residents Forums and such work as the more recent Direct Debit Campaign, speaking with residents and supporting them with direct debit sign-ups in Bayard Place.

The digital inclusion training has engaged many people over the last two years, however in the last six months since collecting the data, 194 have completed feedback forms which indicate that people’s confidence in the use of IT equipment and devices and accessing online services has improved. 40% of those attending sessions and completing a feedback form state that they had improved their perceived digital skill level. The council will continue to hold training, workshops and drop in sessions to help people get the most out of their devices, whether it is a laptop, tablet or smart-phone, and develop their internet skills. These sessions will be run at a variety of locations across the city including,

libraries, community centres, and other suitable facilities.

As part of the council's service transformation plans, support for vulnerable customers is critical to the success of delivering services differently. The People and Communities Strategy sets out the council's plans for working with communities and vulnerable groups. Much of the People and Community strategy is being delivered with Peterborough City College and the Community Serve programme. This has established community hubs that work with the local communities and vulnerable people to access services, provide information, guidance and support and reduce social isolation.

Vulnerable customers (including older people, people with physical disabilities, learning disabilities or mental health issues) may need additional help in accessing digital services. This may be because they have little or no opportunity to access the internet or they may simply not want to. The council recognises that digital inclusion is about having the right access, skills, motivation and trust. As set out above, the council is helping people to get online and use services confidently and safely. In addition to the help already outlined, the council is also:

- investigating volunteer time banks for digital knowledge sharing;
- promoting the benefits of digital for other uses such as keeping in touch with family and friends via Skype, social networking, online banking and shopping, ancestry research, etc;
- Investigating the provision of a "helpline";
- ensuring any new digital services are tested with older people groups to ensure they are easy to use with a good customer experience; and
- aiming to test services across the digital inclusion scale, which was developed by the Government Digital Service to ensure that the needs of all types of users are considered when developing new digital solutions.

The council commissions a number of voluntary sector providers to help meet the needs of vulnerable people. This includes, DIAL Peterborough (for physical disabilities), Enabling Independence Service (for Learning Disabilities and Autism), MIND (for mental health), Age UK (for older people) and Citizens Advice Peterborough for all other advice and support needs. Many of these organisations (and others) provide help to thousands of clients a year by providing targeted support and advice to ensure that customers can access the services they want and need. Citizen Advice for example have IT equipment free for public use and will help clients to get online where needed.

In addition to the support that we are providing to help customers use digital services, the council also helps to meet other needs for vulnerable people (for instance, learning disabilities, debt, low income or limited English language skills) who may require additional help to manage their finances and make payments.

The council supports and will continue to support these customers through a range of services provided directly, or indirectly through local voluntary and community organisations, some examples of which are set out below:-

- Peterborough Community Assistance Scheme (PCAS) is delivered through a network of local charities. PCAS supports people to manage a short term financial crisis and through information and advice, clients are provided with the skills they need to help reduce the likelihood of a crisis reoccurring.
- Rainbow Savers Credit Union is also part of the scheme and provides invaluable support to customers who, for a variety of reasons, are unable to open even a basic bank account at a High Street branch. Without the support of the Credit Union, customers would be financially excluded and face barriers to employment, housing or financial products. The Credit Union also works with its customers to provide better money management skills, by promoting budgeting and saving rather than relying on expensive high cost credit and loan companies or Loan

Sharks.

- Help to learn English working with the City College and other local providers, the council will expand the ESOL (English for Speakers of Other Languages) offer in the city. This will enable more people to improve their skills, find or improve their employment and access services.

Remedial actions will be further considered following the consultation and throughout the implementation of the Payment Strategy.

Once implemented, how will you monitor the actual impact?

The profile of those using the system will be monitored. A six month review will be undertaken to determine the impact of the e-permit system. This will include a discussions with a wide profile of customers to understand how the system can be improved.

Policy review date	
Assessment completed by	Damian Roberts
Date Initial EqIA completed	28/06/17
Signed by Head of Service	

Equality Impact Assessment:

Full assessment

Name/title of the policy area/strand or programme with which this assessment is concerned

Parking e-permit system

Description/summary of the policy area/strand or programme

It is proposed to replace the current paper based parking permit system, which is administered at the Cash Office, with an on-line e-permit system. Currently, customers have to visit the Cash Office to apply and purchase their parking permits. The Cash Office then record the purchase on their parking system which each evening updates the enforcement system used by the Prevention and Enforcement Service (PES).

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The evidence base (list the principal sources of relevant evidence, both quantitative and qualitative.

Census 2011
English Indices of Deprivation, 2015

What the evidence shows – keys facts

The RPZs operates in wards with a higher population density than the city average. These wards tend to have a more youth profile than the Peterborough average, but a greater number of people who from an ethnic group other than white, with the exception of Fletton and Woodston. These wards are also amongst the most deprived in Peterborough, experiencing lower levels of full and part-time employment, but also lower levels of unemployment.

Challenges and opportunities

(indicate the policy's potential to reduce and remove existing inequalities)

Opportunities:

- it is easier and more convenient for you to apply, pay and activate your permit; you will not be restricted to the opening hours of the cash office;
- you can't lose or forget to display your permit. This means that you and the council will not have to waste time appealing against tickets issued when a permit is not on display;
- there will be not be a charge if you want to change vehicles registered to the permit; you will be able to do this at your convenience, whenever you wish;
- the reduced abuse of the parking permit system, i.e. reducing the use of a visitor permit as an additional residential permit and the use of visitor scratch cards for working week parking, etc.

Challenges:

- ensuring those who are digitally excluded or dismissive have access to the service;
- prevent those who are digitally included applying and abusing the use of physical permits.

Summary of Equality Impact Assessment

It is recognised that there will be an impact on existing parking permit holders. However, there is sufficient mitigation and support outlined to ensure a negative impact is not experienced by any customer.

The consultation feedback process will also help inform the final approach and the Cabinet decision on the 25 September 2017.

Next Steps

Update the Equality Impact Assessment following feedback from the consultation.

A final decision on the e-permit system will be made on 25 September 2017.

This EIA is a living document and, accordingly, it will be revised and updated, as appropriate, in the light of further evidence, discussions and representations.

Policy review date	
Assessment completed by	Damian Roberts
Date Full EqIA completed	28/06/17
Signed by Head of Service	

Please send your completed assessment to equalityimpactassessments@peterborough.gov.uk. The Compliance Team will ensure that the assessment is published on the website.