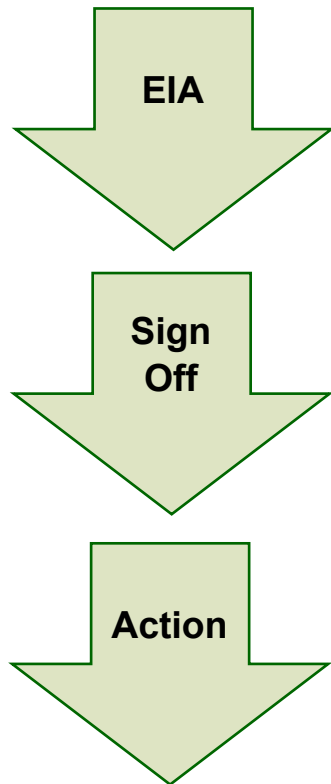


Warwickshire County Council (THE AUTHORITY) Equality Impact Assessment (EIA) Form

The purpose of an EIA is to ensure THE AUTHORITY is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available [here](#).

Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team on 01926 412370 or via equalities@warwickshire.gov.uk, or if it's relating to health inequalities, please contact Ruby Dillon via rubydillon@warwickshire.gov.uk.



- Having identified an EIA is required, ensure that the EIA form is completed before any work is started. This includes gathering evidence and / or engaging the relevant stakeholders to inform your assessment.
- Brief the relevant Assistant Director for sign off and upload the completed form here: [Upload Completed Equality Impact Assessments](#). Please name it “EIA [project] [service area] [year]”
- Undertake further research / engagement to further understand impacts (if identified).
- Undertake engagement and / or consultation to understand if EIA has identified and considered impacts.
- Amend accordingly to engagement / consultation feedback and brief decision makers of any changes.
- Implement proposed activity.
- Monitor impacts and mitigations as evidence of duty of care.

Section One: Essential Information

Service / policy / strategy / practice / plan being assessed	Service
Business Unit / Service Area	Parking Management
Is this a new or existing service / policy / strategy / practice / plan? If existing, please state date of last assessment.	This is a new plan to review Warwickshire County Council's pay and display machine stock; with a view to provide increased methods of payment for better convenience to our customers.
EIA Authors N.B. It is best practice to have more than one person complete the EIA to bring different perspectives to the table.	Paviter Singh Atwal Emily Brough
Do any other Business Units / Service Areas need to be included?	No
Does this EIA contain personal and / or sensitive information?	No
Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?	No If yes , please let your Assistant Director and the Customer Relations Team know as soon as possible

1. Please explain the background to your proposed activity and the reasons for it.

Proposal

To replace existing machines with card and contactless payment methods for all machines. It is also proposed that 50% of these new machines are to have cash payment capabilities.

The siting and provision of machines will be rationalized; many P&D locations are oversubscribed with machines, especially in areas dominated with Resident Permitting schemes.

To align with the Authorities commitment to carbon neutrality and the climate emergency declaration it is recommended that all machines are upgraded to solar powered machines enabling card transactions.

Background

Warwickshire County Council (THE AUTHORITY) currently own 250 on street P&D machines of which 205 are active machines, these are based in Leamington (93 machines), Warwick (32 machines), Kenilworth (7 machines), Rugby (22 machines), Stratford Upon Avon (43 machines) and Stratford Park & Ride (8 machines). All machines are manufactured and maintained by Cale, now called Flowbird and are cash only with no provision for card payments. The machines are all model MP104.

The Authority undertook operations from the Districts and Boroughs in 2014 including the existing machine stock. The Management Team are experiencing an increasing number of complicated faults which take time to diagnose and repair. Many parts are now discontinued causing disruption, complaints and it is impacting income.

The Authority provides customers with cashless parking option, customers can pay by app, phone text or on the website. Since COVID 19 cashless transactions have continued to increase to over 50% of all parking payments taken.

The Authority experience continued low-level and high-level impact from vandalism due to attempts to obtain cash from our machines. Advice from Police has suggested that keeping large amounts of cash on street encourages crime and they have advised that the council looks at other payment options.

Rationale

It is recommended that all replacement machines should have card and contactless payment facilities to serve the large proportion of customers with a preference to use electronic purchasing methods. There is a national shift towards card payments being the primary payment method across all sectors. It is more secure and convenient for both the customer and provider, with streamlined and auditable processes. This additional method will streamline the process of purchasing a ticket from the machines, in turn reduce the human element of dealing with cash from counting the coins, cash amounts banked and reconciling the amounts held in the cashboxes of the machines. The card element compared to cash is more auditable and easier to monitor.

It has been approved at Corporate Board for 50% of new machines will include cash payment facilities to provide customers with multiple many payment options to enable all customers their preferred method of payment. It is anticipated that the number of cash transactions will reduce following the introduction of card/contactless payment options.

Between 2020 and 2022 both Warwick District Council and Stratford District Council have removed cash payment facilities from their off street car parks. Visitors visiting both districts must either pay with card or move to the WCC operated on-street car parking locations.

Consultations with our various BID Teams and elected members concluded that the provision of cash in our on street locations is appropriate at this time, this will be monitored by the Council and where appropriate, gradual phasing out of the cash payment method in our P&D machines.

Environment policies / Energy strategy policy (council policies)

It is proposed to replace all existing electricity fed Cale 104 machines with solar powered machines, inline with the Warwickshire Energy plan and our commitment to reducing our carbon usage.

2. Please outline your proposed activity including a summary of the main actions.

The Authority will be going to the market using the ESPO framework.

A full review of all existing P&D machines has been undertaken looking at machine location, income and usage figures to identify the volumes and locations of the new machines.

Engagement with stakeholders has supported our decision to continue with the cash payment option, both Leamington and Stratford BID stressed the importance of enabling those with protected characteristics access to our town center facilities. Elected members have been briefed on details of the new machines, the continuation of cash and the provision of solar fed.

Procurement, legal, western power and NSL will all be involved in the procurement to understand the risks and actions to be taken to process the machine replacement.

Monitoring customer feedback based on delivery of the first tranche of machines and the impact it has had on those with protected characteristics.

3. Who is this going to impact and how?

Customers	Members of the Public	Employees	Job Applicants
X	X		
Other, please specify:			

Section Two: Evidence

Please include any evidence or relevant information that has influenced the decisions contained in this EIA. This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups and additional groups outlined in Section Four.

A – Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

Looking nationally, in 2017, debit cards overtook cash in the UK as the most common method of payment. Cash transactions have continued to decrease with debit card transactions on the increase every year.

As of October 2021, there were approximately 52.97 million credit card accounts in the UK, with almost two-thirds of these (34.79 million) being active (those with balances outstanding at the end of the calendar month).

As of February 2022, there were 59 million resident credit cards in circulation across the UK of these 53 million were contactless. Given that the UK population in 2021 was about 67.2 million, this equates to almost 1.3 cards per UK resident.

By 2025, the number of credit cards in the UK is projected to reach 63.64 million, while the number of debit cards is forecast to exceed 108.6 million.

Looking locally, since the introduction of the cashless parking app in 2017 in Warwickshire, there has been significant shift from cash transactions over to using the cashless App to purchase parking sessions. The table below shows the clear and significant shift towards the cashless option.

Warwickshire's on street transaction volumes

2022	Cash	RingGo	Cash	RingGo
Apr	71,601	74,742	49%	51%
May	72,224	82,899	47%	53%
Jun	67,989	80,262	46%	54%
Jul	69,701	87,409	44%	56%
Aug	69,522	85,952	45%	55%
Sep	64,103	88,452	42%	58%
Oct	57,777	90,585	39%	61%
Nov	55,314	93,654	37%	63%
Dec	55,563	105,662	34%	66%
Jan	45,546	96,894	32%	68%
Feb	42,613	95,325	31%	69%
Mar	46,675	110,791	30%	70%

Mobile phone ownership stats

The website Statista states that in 2018 95% of UK adults own a mobile phone. It is likely that this number has increased in the last three years. Many of the 5% who do not own a phone have disabilities that would entitle them to a disabled blue badge or concessionary bus pass.

In relation to ages of the population who use smartphones in 2021, % of the population, by age group, that use a smartphone:

16-24 years – 98% hold a full driving licence
25-34 years – 99% hold a full driving license
35-44 years – 97% hold a full driving license
45-54 years – 98% hold a full driving license
55-64 years – 90% hold a full driving license
65 years plus – 69% hold a full driving license

In March 2021 92% of UK mobile users own a smartphone. As of 2021, 88% of all adults in the UK had a smartphone.

Stats on car ownership, driving license stats (blue badge) (majority that do not have a card most likely have a blue badge)

The Department for Transport produces information and statistics in relation to driving license holders.

In the 5 years from 2015 to 2019, an average of 74% of people in England had a full driving license.

Analysis in relation to race has identified that 76% of White people had a license – the highest percentage out of all ethnic groups. 53% of Black people had a license – the lowest percentage out of all ethnic groups.

The percentage of people with a driving license went up from 71% to 74% during the period covered by this data.

In relation to ages of driving license holders in 2019 the following % of the population, by age group, had a full driving license:

17-20 years – 35% hold a full driving license
21-29 years – 62% hold a full driving license
30-39 years – 79% hold a full driving license

40-49 years – 86% hold a full driving license
50-59 years – 86% hold a full driving license
60-69 years – 85% hold a full driving license
70 years plus – 67% hold a full driving license

It should be noted that compared to 1990 the percentage of driving license holders in all age groups has increased, other than the 17 to 19 age range where the numbers of holders have decreased by around 5%.

In 2019 there were 1.2m vehicles licensed in the disabled tax class, this was a 0.4% decrease compared to 2018. Where motorists have disabilities, the council provides a disabled blue badge parking scheme. In the UK there are 2.44m blue badges issued to motorists in the UK. This badge enables the holder to park for free at all pay and display locations, as well as at other restrictions such as marked disabled bays or safely where there are double yellow lines. This negates the need for those with disabilities to use pay and display equipment.

In relation to ages of blue badge holders in 2020 the following % of the population, by age group had a blue badge:

0-19 years – 1% hold a blue badge
20-29 years – 0.9% hold a blue badge
30-39 years – 1.8% hold a blue badge
40-49 years – 2.8% hold a blue badge
50-59 years – 3.1% hold a blue badge
60 years plus – 10.3% hold a blue badge

B – Qualitative Evidence

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

The Authority undertook operations from the districts in 2014, including all existing on street machines, they are now nearing end of life. We are experiencing an increasing number of complicated faults which take time to diagnose and repair. Many parts are now

discontinued causing disruption, complaints and it is impacting income, as well as certain parts not included within the current contract with Flowbird, therefore incurring additional costs. The demand and usage of the machines is there, and The Authorities maintenance contract currently costs ~£100k per annum, the web office ~£20k per annum.

Both Warwick District Council and Stratford District Council have removed the cash option in all their off-street car parks, visitors to Leamington, Warwick, Kenilworth and Stratford must now pay using card or park in a WCC on street parking pay, or on an unrestricted road.

Discussions with other parking managers at other council's has identified that many councils are actively considering removing cash as a parking payment option. Gloucester and Dorset County Councils have revealed that they have or are in the process of taking a decision relating to removing cash payments in 2022. Several councils in London, such as Westminster, have moved away from offering cash as a payment option. Rutland Council have also recently stopped accepting cash in their off streets pay and display machines, with very few public objections received.

The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.

Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks. Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.

Section Three: Engagement

Engagement with individuals or organisations affected by the proposed activity must take place. For further advice and support with engagement and consultations, click [here](#).

Has the proposed activity been subject to engagement or consultation with those it's going to impact, taking into account their protected characteristics and socio-economic status?	No	
If YES, please state who with.		
If NO engagement has been conducted, please state why.	The implementation of increased payment options will benefit all customers. There will be a parking machine enabling cash payments at each location. Machines taking card/contactless AND cash will be clearly identifiable on street with a large sticker on the machine itself. On Card/contactless ONLY machines, customers will be directed to the nearest cash machine. Machine location maps will be available online and paper copies will be available.	
How was the engagement carried out?	Yes / No	What were the results from the engagement? Please list...
Focus Groups		
Surveys		
User Panels		
Public Event		
Displays / Exhibitions		
Other (please specify)		
Has the proposed activity changed as a result of the engagement?		
Have the results of the engagement been fed back to the consultees?		

Is further engagement or consultation recommended or planned?	No	
What process have you got in place to review and evaluate?		

Section Four: Assessing the Impact

Protected Characteristics and other groups that experience greater inequalities

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposed activity? This section also allows you to consider other impacts, e.g. health inequalities such as deprivation, socio-economic status, vulnerable groups such as individuals who suffer from socio-economic disadvantage, armed forces, carers, homelessness, people leaving prison, young people leaving care etc.

On the basis of evidence, has the potential impact of the proposed activity been judged to be positive (+), neutral (=), negative (-), or positive and negative (+&-), for each of the protected characteristic groups below and in what way?

N.B In our Guidance to EIAs we have provided you with potential questions to ask yourself when considering the impact of your proposed activity. Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at Section Six.

	Impact type (+) (=) (-) or (+&-)	Nature of impact
Age	+&-	<p>Research has identified that 85% of 60-69 year olds have a full driving license with this figure decreasing to 67% for the over 70s. As this demographic may not be as e-enabled as younger generations it is likely that this group may be impacted the most.</p> <p>However, with nearly every UK resident owning 1.3 bank debit or credit cards and 95% owning a mobile phone it is likely that most users would still be able to pay for parking using a bank/credit card or using the pay by phone or online facility. The small percentage that are not able to would be able to use a private car parks, limited wait bays or other modes of transport.</p>

		<p>Members of this group may also be entitled to a free concessionary bus pass that enables them to travel on local bus services for free, thus providing a sustainable alternative to driving and paying for parking at their destination.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
<p>Disability Consider:</p> <ul style="list-style-type: none"> • Physical disabilities • Sensory impairments • Neurodiverse conditions (e.g. dyslexia) • Mental health conditions (e.g. depression) • Medical conditions (e.g. diabetes) 	<p>=</p>	<p>Many individuals within this group would qualify for a disabled blue badge that enables them to park at a number of locations for free including pay and display bays, shared use bays, limited waiting bays and yellow lines. This avoids any interaction with pay and display equipment. Designated disabled bays can be found on the highway for blue badge holders, making accessibility easier to local facilities and amenities.</p> <p>Data shows that nearly every UK resident owns 1.3 bank debit or credit cards and 95% owning a mobile phone it is likely that most users would still be able to pay for parking using a bank/credit card or using the pay by phone or online facility. The small percentage that are not able to would be able to use a district council or private car parks.</p> <p>Members of this group may also be entitled to a free concessionary bus pass that enables them to travel on local bus services for free, thus providing a sustainable alternative to driving and paying for parking at their destination.</p>

		<p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
Gender Reassignment	=	<p>No impact on this characteristic has been identified.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
Marriage and Civil Partnership	=	<p>No impact on this characteristic has been identified.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>

Pregnancy and Maternity	=	<p>No impact on this characteristic has been identified.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
Race Including: <ul style="list-style-type: none"> • Colour • Nationality • Citizenship • Ethnic or national origins 	-	<p>The decision may marginally impact members of the Black, Asian and Minority Ethnic (BAME) community greater than other groups. However, this would be as a result of socio-economic reasons rather than as a direct result of race. It should be noted that, based on DfT data, the BAME community are the least likely to have a UK driving license.</p> <p>Despite nearly every UK resident owning 1.3 bank debit or credit cards it is likely that this group are the most likely to not own a bank/debit card, especially if they are new to the UK.</p> <p>Those that are not able to pay for parking using a bank/debit card would be able to use a private car parks, limited wait bays or other modes of transport.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p>

		Alternative travel modes include, park and ride sites, public bus services, walking, cycling, train.
Religion or Belief	=	<p>No impact on this characteristic has been identified.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
Sex	=	<p>No impact on this characteristic has been identified.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p> <p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
Sexual Orientation	=	<p>No impact on this characteristic has been identified.</p> <p>The council provides an appeal process for all PCNs that are issued and has a published discretionary policy outlining where discretion can be fettered.</p>

		<p>Alternative parking options include limited waiting bays located close to town centres and in residential areas, unrestricted parking locations, off street car parks.</p> <p>Alternative travel modes include, Stratford park and ride, public bus services, walking, cycling, train.</p>
<p>Individuals who may require additional support:</p> <ul style="list-style-type: none"> • Individuals who suffer socio-economic disadvantage • Armed Forces (THE AUTHORITY signed the Armed Forces Covenant in June 2012) • Carers • Homelessness • People leaving Prison • People leaving Care 		<p>No impact on this characteristic has been identified.</p> <p>Most likely the individuals within this category will not be able to afford a vehicle, as well as the requirements to obtain a driving licence.</p> <p>Alternative travel modes include, public bus services, walking, cycling, train.</p>
<p>Health Inequalities (HI) Many issues can have an impact on health: is it an area of deprivation, does every population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc</p>	=	<p>Prompts (remove once completed):</p> <p>What health inequalities already exist?</p> <ul style="list-style-type: none"> • You may want to look at existing service data/information that highlights health inequalities that already exist (look at supporting document for sources of information). <p>Will your proposal have a negative or positive implications on health inequalities?</p> <ul style="list-style-type: none"> • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income. <p>What can you do to mitigate any identified health inequalities?</p> <ul style="list-style-type: none"> • Think about offering for example benefits advice, access to bus routes, community support, flexible opening times, creche facilities etc

Other Groups If there are any other groups		
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Public Sector Equality Duty (PSED)

Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please evidence how your proposed activity meets our obligations under the PSED.

	Evidence of Due Regard
Eliminate unlawful discrimination (harassment, victimisation and other prohibited conduct):	
Advance equality of opportunity: This involves <ul style="list-style-type: none"> • removing or minimising disadvantages suffered by people due to their protected characteristics; • taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, for example, taking steps to take account of people with disabilities; • encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. 	
Foster good relations:	

This means tackling prejudice and promoting understanding between people from different groups and communities.

Section Five: Partners / Stakeholders

Which sectors are likely to have an interest in or be affected by the proposed activity?	Yes / No	Describe the interest / affect
Businesses	Yes	Impact on parking access
Councils	Yes	Correspondence regarding the change
Education Sector	No	
Fire and Rescue	No	
Governance Structures	No	
NHS	No	
Police	No	
Voluntary and Community Sector	Yes	Impact on parking access
Other(s): please list and describe the nature of the relationship / impact		None

Section Six: Action Planning

If you have identified impacts on protected characteristic groups in Section Four please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Mitigating Actions

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts or build on positive impacts for protected groups or health inequalities
- Whether you could do more to fulfil the aims of the PSED
- How you will monitor and evaluate the effect of this work
- Anything else you can think of!

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible
	<i>Review and monitor EIA in line with developments, including engagement and consultation</i>		

No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposed activity.

Section Seven: Assessment Outcome

Only one of following statements best matches your assessment of this proposed activity. Please select one and provide your reasons.		
No major change required		
The proposal has to be adjusted to reduce impact on protected characteristic groups and/or health inequalities		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and/or health inequalities		

Stop the proposal as it is potentially in breach of equality legislation		
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Section Eight: Sign Off
N.B To be completed after the EIA is completed but before the area of work commences.

Name of person/s completing EIA	
Name and signature of Assistant Director	
Date	
Date of next review and name of person/s responsible	

Once signed off, please ensure the EIA is uploaded using the following form. Please name it “EIA [project] [service area] [year]”: [Upload Completed Equality Impact Assessments](#)

These will be stored on a [Sharepoint library](#) which THE AUTHORITY colleagues can access.