



Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet
Text in blue is intended to provide guidance – you can delete this from your final version.

<p>What are the proposals being assessed?</p>	<p>Application to change Merton's PCN charge band from band B to band A. To effect this a full business case will need to be presented to Full Council. Following this, an application will be made to the London Councils Transport, and Environment Committee. Depending on the outcome at the Committee, the Mayor will also be required to ratify the application and the Secretary of State has final sign off.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>The purpose of PCN parking charges is to dissuade motorists from breaking parking restrictions and charges must be proportionate. The income from charges must only be used in accordance with the Road Traffic Regulation Act 1984. These purposes are contained within the Council's traffic management and other policy objectives.</p>
<p>Which Department/ Division has the responsibility for this?</p>	<p>Parking Services, Environment and Regeneration</p>

<h3>Stage 1: Overview</h3>	
<p>Name and job title of lead officer</p>	<p>Ben Stephens, Head of Parking</p>
<p>1. What are the aims, objectives and desired outcomes of your proposal? (Also</p>	<p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p>

<p>explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc)</p>	<p>Local authorities are not permitted to use PCN parking charges solely to raise income. When setting charges, we must instead focus on how the charges will contribute to delivering the Council's traffic management and other policy objectives.</p> <p>This proposal supports the rationale of seeking to adjust driver behaviour and to ensure that we can provide a modern, efficient and environmentally sustainable transport policy for residents, visitors and businesses, now and in the future.</p>
<p>2. How does this contribute to the council's corporate priorities?</p>	<p>Parking and Traffic Management</p> <p>This proposal is part of the important role Parking and transport policy has in managing the roads and wider travel needs of the public. Merton's policy links closely with the local Implementation Plan and the Mayors Transport Strategy, which sets out objectives in detail.</p> <p>It contributes in the following ways:</p> <ol style="list-style-type: none"> 1. Reduce congestion 2. Improve road safety 3. Improve air quality and meet EU quality standards 4. To meet the actions set out in the Merton Health and Wellbeing Strategy 2019 5. Adopt a healthy street approach 6. Promote healthier life styles and encourage more active travel 7. To ensure good parking management 8. To support the local economy 9. Providing funding for parking and wider transport scheme improvements
<p>3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>The proposal will affect all residents, businesses, workers and visitors to the borough, across all socio-economic groups.</p>

4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?

Yes. Responsibility is shared with the following departments, organisations and partners.
Future Merton, Highways and Transportation, Planning, Mayor of London, TfL, transport operators, Parking Services.

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Stage 2: Collecting evidence/ data

5. What evidence have you considered as part of this assessment?

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

Following the Council meeting of 5 February 2020 at which Council made a resolution to apply to amend parking Penalty Charge Notice (PCN) from Band B charges to Band A, a boroughwide consultation was under taken between 16 March 20 and 27 July 20.

In addition to notifying the statutory consultees of the consultation, details were also sent to the equality groups notifying them of this proposal. All consultees had at least 6 weeks notice in which to consider the proposal and submit any views they felt relevant to the consultation.

The following themes were brought up in relation to certain equality groups;

- i. Disability – access to and enforcement of Blue Badge bays
- ii. Pregnancy and Materinty – access to parking close to final destination
- iii. Religion – the perceived lack of enforcement of parking restrictions in the vicinity of religious centres
- iv. Socio-economic – increased PCN costs and lack of payment instalment options will impact most on those in this equality group

Stage 3: Assessing impact and analysis

6. From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?

Protected characteristic (equality group)	Tick which applies		Tick which applies		Reason Briefly explain what positive or negative impact has been identified
	Positive impact		Potential negative impact		
	Yes	No	Yes	No	
Age	X			X	<p>Positive Impact</p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of</p>

					spaces. <u>Potential Negative Impact</u> None identified
Disability	X			X	<u>Positive Impact</u> The proposals support the principle of effective traffic management for the whole population of and visitors to Merton. In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces. The increased charges will act as a deterrant to those parking illegally in Blue Badge bays, and other locations, increasing the amount of available parking spaces for disabled motorists. <u>Potential Negative Impact</u> None identified
Gender Reassignment	X			X	<u>Positive Impact</u> The proposals support the principle of effective traffic management for the whole population of and visitors to Merton. In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces. <u>Potential Negative Impact</u> None identified
Marriage and Civil Partnership	X			X	<u>Positive Impact</u> The proposals support the principle of effective traffic management for the whole population of and visitors to Merton. In setting out its measures of success, the proposed bandings and

					<p>increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Pregnancy and Maternity	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>Comments were made relating to pregnant mothers, and mothers of young children being unfairly issued with PCNs when they are required to park illegally to access their house, however as stated above, an increase in PCN charges aims to deliver better compliance and driver behaviours and lead to improved availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Race	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p>

					None identified
Religion/ belief	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p>Concerns were raised about a perceived lack of enforcement in the areas around religious centres on worship days, as above, the proposed increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will lead to improved availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sex (Gender)	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Sexual orientation	X			X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p>

				<p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>None identified</p>
Socio-economic status	X		X	<p><u>Positive Impact</u></p> <p>The proposals support the principle of effective traffic management for the whole population of and visitors to Merton.</p> <p>In setting out its measures of success, the proposed bandings and increase in PCN charges aims to deliver better compliance and driver behaviours in respect of parking regulations, which will reduce congestion, and lead to improved traffic flows and availability of spaces.</p> <p><u>Potential Negative Impact</u></p> <p>If the cost of a PCN increases, those on lower incomes may find it more difficult to pay the penalty charge.</p> <p>Concerns raised that with increased PCN charges and no facilities for payment plans, this will affect those in this equalities group.</p>

7. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

This action plan should be completed after the analysis and should outline action(s) to be taken to mitigate the potential negative impact identified (expanding on information provided in Section 7 above).

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Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	How will you know this is achieved? E.g. performance measure/ target)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?
Socio-economic status	Consultation	An increase in the cost of a PCN may have a negative effect on the ability of individuals on low income to pay. Any changes to the current banding charges will involve further consultation with those groups affected	2020	Within existing resources.	Ben Stephens	Actions will be added once the consultation has been completed.
Socio-economic status	Post-consultation	<p>The consultation was advertised in MyMerton which is delivered across the borough and available to collect at key points such as libraries. This ensures as far as possible that those living in Merton are informed and those visiting also have an opportunity to be aware. In addition, the consultation was on our website and highlighted via different social media channels such as Twitter and Facebook.</p> <p>The known Resident Associations and Equality Groups were also informed and encourage to complete the online survey so that we could capture their views.</p> <p>It should be noted that it is only the minority of motorists that receive PCNs for illegal parking, and it should further be noted that the majority of PCNs issued are 'avoidable' PCNs.</p> <p>All motorists driving on the roads in England, Scotland and Wales are required to read the Highway Code, which is a set of driving and parking rules for motorists to follow. Many of these rules are legal requirements, and the Highway Code warns aspiring motorists that a failure to follow these rules can result in penalties,</p>				

	<p> fines, endorsements on their licence, and in the most severe cases, criminal prosecution and imprisonment.</p> <p> All UK licence holders are legally required to study the Highway Code as part of their driver training, and they are also required to take and pass a theory exam on the Highway Code, before they are allowed to take their practical driving tests.</p> <p> PCNs are only issued where a motorist has parked illegally.</p> <p> If all motorists were to follow the driving and parking rules contained within the Highway Code, there would be no need for enforcement.</p> <p> All representations are considered on their own merit and mitigation may be taken into account in some circumstances.</p> <p> The enforcement of PCNs is a statutory process, and there is no provision within the legislation for a PCN to be paid in any time frame other than the legal time frames set out in the appropriate legislation.</p> <p> The policy of not allowing payments by installments was last reviewed in 2013 and full details can be found on the council's website; https://www.merton.gov.uk/streets-parking-transport/parking/pcn/installments</p> <p> It is considered that the effects of the increase in PCN Banding charges would be of benefit to all equality groups as it will mean greater availability and turn over of parking spaces, and any negative impact on socio-economic equality groups can be justified on the basis that PCNs are only issued for illegal parking, and the motorist has a statutory</p>				
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		right to appeal should they believe the PCN was issued incorrectly.				

Note that the full impact of the decision may only be known after the proposals have been implemented; therefore, it is important the effective monitoring is in place to assess the impact.

Stage 4: Conclusion of the Equality Analysis

8. Which of the following statements best describe the outcome of the EA (Tick one box only)

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

OUTCOME 1

OUTCOME 2

OUTCOME 3

OUTCOME 4

Stage 5: Sign off by Director/ Head of Service

Assessment completed by	Ben Stephens – Head of Parking Services	Signature:	Date: 28th January 2020
Improvement action plan signed off by Director/ Head of Service	Chris Lee – Director of Environment and Regeneration	Signature:	Date: 28th January 2020