SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	**Environment and Community Services**
Service Area	**Parking Operations**
Service/policy/function being assessed	**CCTV moving traffic and parking enforcement**
Which borough (s) does the service/policy apply to	**Wandsworth and Richmond**
Staff involved	**Clare O'Connor, Nic O'Donnell, James Marshall, Steve Cull, Adam Westwood**
Date approved by Directorate Equality Group (if applicable)	**February 2020**
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	
Date submitted to Directors' Board	

SUMMARY

Please summarise the key findings of the EINA. The Council use CCTV cameras for the purpose of parking and moving traffic enforcement. These cameras are currently shared by the Parking Operations Team (parking and moving traffic enforcement) with the equipment owners, the Community Safety Team (detect and prevent crime), however the cameras are old and will soon be replaced by alternative CCTV equipment. This new equipment is not compliant with parking and moving traffic enforcement legislative requirements. The Parking Operations Team do have a small number of their own CCTV cameras however the existing support and maintenance contract will also finish shortly. We therefore propose to purchase new CCTV cameras along with a service programme that can be used for parking and moving traffic enforcement. This type of enforcement service is important in ensuring free movement of traffic through the boroughs to reduce congestion and pollution, whilst also making roads safer for cyclists, pedestrians and motorists. Furthermore, we can protect the parking needs of all our residents, businesses and visitors through improved accessibility. These benefits are available to all, without prejudice. It is therefore important to use new technology to support a mobile society and deliver a consistent parking and moving traffic management service. The existing CCTV cameras cover numerous contravention types and therefore any new operating system must be technologically advanced enough to enforce a variety of parking violations including stopping in a box junction, driving in a bus lane, failing to comply with a no entry restriction

or stopping in a bus stop or outside of a school where prohibited. Locations are selected where there is community support for the introduction of such measures.

The various UK Acts (The Road Traffic Act 1988, Traffic Management Act 2004 etc) and the Highway Code cover all the mandatory rules for all road users for the purpose of road safety. These laws act as a guidance of acceptable behaviour and if these regulations are violated then the consequence is the issue of a Penalty Charge Notice (PCN) fine supported by CCTV footage. There can be little to no discrimination, as the vehicle is 'seen' committing the offence as opposed to the driver. The enforcement of these laws therefore ensures equality and parity across our communities. Noe of the contraventions monitored via CCTV offer an exemption to disabled blue badge holders, there is no danger of the badge not being seen.

Income from parking and traffic enforcment is ringfenced for transport related projects and is reinvested into the transport infrastructure, for example highway maintenance that supports the community at large and concessionary travel which offers free bus and tube travel for elderly and disabled residents. The recovery processes set out in legislation provides a legal appeal process to deal with disputes about liability. The council considers mitgation at the earliest stage (following PCN issue) and all debt precovery process include legal requirements for dealing with vulnerable debtors.

1. **Background**

Briefly describe the service/policy or function:

Fundamentally there will be no change to the types of contraventions we enforce, the locations within the boroughs upon which we focus on nor in the way the PCNs are issued. The only crucial change will be the loss of manually controlled CCTV cameras, as the new cameras will all operate via number plate recognition technology i.e. automatically. This will therefore completely eliminate any possible unfairness in the capture process as every contravention committed is effectively processed.

Whist the advantages of the capture process are obvious (24/7 surveillance, high capture rate, less errors etc) we still can maintain a 'human element' within the process as contraventions will nevertheless be reviewed and finalised by an operator.

ANPR recognition technology presents further potential opportunities in assisting with alternative transport objectives such as enforcement of the emission zone or by supporting the liveable neighbourhood scheme and school living street programmes. This type of detection technology could monitor traffic simultaneously for a variety of purposes without compromise.

2. Analysis of need and impact

We have looked at borough level data as there is no service specific data that is appropriate. Such data is not made available to the Council through tis particular enforcement operation.

Protected group	Findings
Age	**GLA 2019 data** Richmond Wandsworth 0 to 15 20.8% 16.8% 16 to 24 63.8% 69% 65 and over 15.4% 14.2%
Disability	**ONS 2011 census data** Richmond Wandsworth Disabilitiy or 11.5% 11.2% health problem that effects their day to day life
Gender (sex)	**ONS 2011 census data** Richmond Wandsworth Male 49% 48% Female 51% 52%
Gender reassignment	N/A
Marriage and civil partnership	**GLA 2019 data** Richmond Wandsworth Divorced 7.9% 6.5% Civil Partnership 0.4% 0.6% Married 47.3% 32.6% Separated 2.2% 2.5% Single 36.7% 54.2% Widowed 5.4% 3.7%
Pregnancy and maternity	**PHOF 2016 data** Richmond Wandsworth Live births per 1000 females 64.57 54.11 (15-44)
Race/ethnicity	**GLA 2019 data** Richmond Wandsworth Persons BAME 15.9% 30.9% UK nationals 82.2% 80.2% Non-UK nationals 17.3% 19.5%
Religion and belief, including non belief	**GLA 2019 data** Richmond Wandsworth Buddhist 0.8% 0.8%

	Christian	55.3%	53%
	Hindu	1.6%	2.1%
	Jewish	0.8%	0.5%
	Muslim	3.3%	8.1%
	Sikh	0.8%	0.3%
	Other	0.5%	0.4%
	No religion	28.4%	27%
Sexual orientation	ONS annual population survey 2017 Approximately 2% of the population identify as LGBT (data inconclusive as often undeclared)		
Across groups i.e older LGBT service users or bme young men	N/A		

Data gaps.

Data gap(s)	How will this be addressed?
Equalities monitoring data is not available for drivers who receive PCNs. Given that any visitor to the borough could potentially receive a PCN, only (inter)national driver statistics could be used to evaluate the impact upon different equality groups. Some data has been complied from national statistics. Such data is also not available for those who request enforcement of parking violations.	N/A

3. **Impact**

<u>Negative impact</u> – if the service/policy will have a negative impact say what this will be and what action can be put in place to mitigate the impact. Even if there is only a small risk that there will be a negative impact put this into the EINA.
If you are changing a service/policy do not just put "no negative impact" you need to include how you know there will be no impact

<u>If the EINA covers both Richmond Council and Wandsworth Council </u>If the strategy/service/policy covers Wandsworth and Richmond be clear on the impact on each boroughs' residents separately and any borough specific actions required.

Protected group	Positive	Negative

Age	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Disability	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Gender (sex)	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Gender reassignment	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Marriage and civil partnership	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Pregnancy and maternity	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Race/ethnicity	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Religion and belief, including non belief	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**
Sexual orientation	**Yes – reduced congestion, safer roads, better air quality, improved accessibility**	**None identified**

4. Actions

These actions will be tracked by the Policy and Review Team.

Action	**Lead Officer**	**Deadline**
No actions		

5. Consultation. (optional section– as appropriate)

There is no specific consultation with the public regarding any specific request to enforce a regularly performed infringement on the highway. The Parking Operations Team respond to individual complaints/queries from members of the public as and when required for a long as is deemed necessary (once compliance is satisfactory).