

Agenda Item No: 11

Report To: CABINET

Date of Meeting: 24th September 2020

Report Title: Removal of cash transactions

Report Author & Job Title: Mandy Cracknell – Parking, Highways and Transportation Team Leader
Maria Stevens – Head of Finance and IT

Portfolio Holders for: Cllr Feacey - Community Safety and Wellbeing
Cllr Bell - Finance and IT



Summary:

This report proposes the phased removal of cash from Council business in response to the wider changes we are seeing in society as a result of digitisation of services and COVID19. This will result in reduced costs including future replacement of machines as they reach end of life.

The proposal is to support this process through marketing and improving internet links in our car parks where needed. There will also be information on different ways to pay displayed in car parks, in our magazine and online, with clear instructions on making these payments.

The removal of cash payments is of benefit to the customers as it will maximise convenience and satisfaction, through ease of use and streamlined processes. This also mirrors the processes put in place by many retailers in response to COVID19, where they are actively discouraging cash payments at the till.

It also supports the safety of our customers, cash handling can lead to transmission of viruses such as Covid-19, it will also aid social distancing by reducing queue and contact with our machines, another potential source of transmission.

The majority of the public have adapted to the behavioural changes that have been accelerated due to the pandemic and have embraced technology and cashless payment options.

The option of cash payments will be available at PayPoint outlets throughout the Borough, with a managed transition to cashless parking, to ensure it is removed as cash transactions reduce.

It should be noted that removing cash from the parking machines is a phased process and will be monitored and reviewed for demand. If cash demand continues to be high, cash will be retained in a number of car parks.

Key Decision: YES

Significantly Affected Wards: All Wards

Recommendations: **The Cabinet is recommended to:-**

- I. Agree the immediate removal of cash payment machines from the Civic Centre reception**
- II. Agree a phased removal of coin payment from our on-street and off-street parking machines**
- III. Agree a phased removal of built in credit card and contactless readers from our on-street and off-street parking machines**

Policy Overview.

The removal of cash payments (over a phased and managed period) is required to ensure an effective, efficient and sustainably service delivery. The proposed approach will be to remove the Civic Centre cash machines and gradual incremental removal of individual parking pay machines in a way that is easily reversible should issues emerge. Initially it is intended that machines be decommissioned in small localised pilots and only followed by larger scale implementation once problems are identified and resolved.

Financial Implications:

Finance and Parking services have a joint approach and will work in collaboration in monitoring the income and % of coin vs cashless options...

Savings could be achieved through the cash collection contract and efficiencies with cash machines:

- Direct cash collection contract costs of £40,000 per annum
- Yearly maintenance costs for parking terminals of approximately £28,000.
- Cost of replacement machines circa £360,000, will many due for replacement within 3 years
- Annual staff time administering reception cash machines can be redeployed (around £7,000 per annum)

Other forms of transactions and the increased use of the PayPoint facility will have a minimal impact on costs; other costs:

- Removing of Civic Centre machines would be a one off cost of around £2,500.
- Removal of parking terminals is estimated to be in the region of £41,000 including groundworks costs.

Legal Implications: There is no specific legal duty to maintain cash payment options. However, there is a general duty for the council to exercise its traffic order function to secure the provision of suitable and adequate parking facilities on and off the highway. It is therefore advisable to retain a number of coin operated parking machines for people who do not own bank cards or until the public has embraced the move to cashless payments.

Reference has already been made to the need to make new Traffic Regulation Orders (TROs) in order to introduce the proposed arrangements. The public will have the opportunity to make representations before the TROs are finalised.

The Council will have to give due weight to any objections and will have to balance the inconvenience of reducing cash payment options against the desirability of reducing operating costs

See Attached

Equalities Impact Assessment:

Data Protection Impact Assessment: NA

Risk Assessment (Risk Appetite Statement): There is a low risk in relation to the fact that there may be a future reduction in car park use for cash only customers.

This is negated by the fact that the removal of cash as a payment option in our car parks is being phased over a number of years.

Sustainability Implications: The removal of the machines will mean that vehicles will not have to be used to collect the cash or complete maintenance. Thereby removing unnecessary journeys.

Other Material Implications: Since COVID-19, there has been a change in customer behaviour, and cash has not been the preferred option for many outlets. Those with the technological ability to take advantage of a cashless society find that it's more convenient. As long as you have your card or phone, you have instantaneous access to all your cash holdings.

The benefits and disadvantages below can give you an idea of the many effects going cashless can have on money and banking;-

Benefits

- To reduce virus transmission risk and health & safety security risks relevant to removing cash from the terminals

- Less money laundering because there's always a digital paper trail
- Less time and costs associated with handling, storing and depositing paper money

Disadvantages

- Those without bank accounts will struggle to keep up with evolving cashless technology
- Some may find it harder to control spending when they don't see physical cash leaving their hands

**Exempt from NO
Publication:**

Background Papers: None

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Report Title: Removal of Cash Transactions

Introduction and Background

1. Currently the council receives cash in two ways - directly into the council, via the Civic Centre cash collection machines and through our car parking machines. The council also offers payments at PayPoint outlets (Appendix A) around Ashford, including the Post Office and many small shops and garages displaying the PayPoint symbol. The council also receives payments online through the use of card transactions and Direct Debit for regular payments such as rents and council tax.
2. The risks associated with using cash have been widely publicised during the Covid-19 pandemic and this has enabled the Council to reflect on its current payment methods and moving forward with a cashless proposal. Some residents will still want to use cash so to implement a successful plan it is important there will still be ways for cash payments to be made. The Council currently work with PayPoint outlets where cash can still be accepted, are available throughout the Borough and many are local to Ashford residents. There would also need to be a phased plan to remove cash slowly from car parks.

Proposal

3. The proposal is to remove the card and coin machines in the Civic Centre main reception and cash from car parking machines. Online payments are being encouraged within the Civic Centre and use of RingGo (pay by phone) for parking payments. PayPoint's would be maintained for the small number of individuals that would like to continue using cash for invoiced items such as rent, Council Tax and sundry debtors.
4. Due to the pandemic, the reception was closed for a substantial period and has only recently re-opened for appointments only. This led to the card and coin machines being closed for the past six months, and has led to no negative responses from our customers. Residents have used alternative payment methods which have led to a change in behaviour. The council offers other payment methods, and thereby the removal of these machines should have an indiscriminate effect on our customers. **Appendix A** has a list of PayPoint outlets available for payments such as Council Tax, rents and invoices.
5. The proposed approach for the removal of cash and card payments from parking machines will be gradual. This will see an incremental reduction of individual pay machines in a way that is easily reversible should issue emerge. Initially, it is intended that machines be decommissioned in small localised pilots, followed by more extensive scale implementation as the concept is proven.
6. Payment machines in the pilot will initially be taken out of service by covering them with a sign explaining this. The sign will also inform motorists of alternative payment methods. With this method of decommissioning machines, payment can be reactivated at very short notice should this be necessary. The proposed programme of removal is detailed in paragraphs 21 to 23.
7. The initial criteria to consider for inclusion/exclusion of machines in pilot decommissioning include:
 - the proximity of other payment machines
 - existing levels of coin vs cashless payment
 - proximity to locations at which fewer customers are likely to use a cashless option

- Possible increase of queues at existing machines if others have taken away where more than one pay machine is available.
8. In both the above cases there will be a proactive marketing campaign in the lead up to implementation with key messages; where to pay with coin, building confidence in the system, and encouraging cashless payment. All these messages will be included in machine signage, street advertisement, our website and other communication methods. The alternative payment method and outlets will be advertised through social media messaging.

Equalities Impact Assessment

9. Members are referred to the attached Assessment. The key issues arising are the impact on customers which fall under the protected characteristic of age and disability. In terms of car parking, it needs to be remembered that in order to tax and insure a vehicle the customer will need to have a bank account, which includes access to a debit card.

Consultation Planned or Undertaken

10. Full implementation could require amendment of TROs. This undertaking does not need a statutory consultation period, as just altering a payment method for parking payment machines. However, to allow members of the public to air their views, it is advisable to offer a consultation period, of 21 days.

Other Options Considered

11. Do nothing: This option retains all costs including, coin processing, machine provision and maintenance, enforcement, insurance, internal coin reconciliation (staff time). The council has 54 parking machines, most are now four years old and require more maintenance as they reach the end of their reliable life. The council will need to incur a future capital cost for machine replacement costing around £360,000.
12. Immediate removal of all parking machines: Although this option is likely to achieve the maximum savings in the shortest period, members were concerned about the impact on some customer groups. To remove all machines would cost in the region of £41,000 with savings in excess of £100,000 per annum.

Recommendations

13. To keep the Civic Centre card and coin machines closed. Information on how and where to pay will be publicised through the reception area, on backs of invoices, residents magazine and through the Council's website and social media platforms. All payment methods are still available to residents; this will be moving cash to other outlets.
14. A phased removal of cash and machines from Ashford Borough's car parks. The plan is flexible and will start with a few machines, and the pace of removal will depend on success. **It is proposed that cash is maintained throughout the phased reduction with possibly one machine per car park remaining if cash payments are in high demand in the future.**

Reasons for Supporting Option Recommended

15. The recommendations as detailed above will bring benefit to the council and the users of our services in the following manner:
- cost reductions in respect of coin processing
 - reduction in cost for machine provision and maintenance
 - savings on insurance
 - staff time saved on financial reconciliation
 - reduced theft of cash from external payment machines
 - modernisation of our services
 - lowers risk of virus transmission
 - increases safety of those using the car park

Next Steps in Process

16. It is anticipated that the recommendations would be implemented in accordance with the following timescale:
- Card and coin machines are currently closed in the Civic Centre and will continue to be closed.
 - Commence the phased removal of cash payments in parking machines as detailed in the programme at paragraphs 21 to 23
 - Updates to be provided to Management Team

Programme

17. Subject to the approval of this report, authority will be given to progress the appointment of an approved contractor to remove machines as detailed.
18. The projects biggest impact will be on the Exchequer team within finance and the Leader for Parking, Highways and Transportation and supported by their Operation and Technical Officers. The project implementation will be accommodated within existing resources but some reduction in normal service standards may be witnessed e.g. longer turnaround times for work.
19. It is anticipated that the work for other core and extended team members will equally be incorporated into existing resources. It should be noted that this project is not in their current service plans and therefore represents additional workload.
20. Subject to the approval of the recommendations contained within this report, the aim is to phase removal of cash machines. Finance and Parking benefit from working closely and this project will allow continued collaboration, in monitoring coin vs cashless to ensure removing the right machines, at the right time, therefore reducing the council's costs and having minimum disruption to existing users.
21. Once agreed the Finance Team will remove the civic centre machines as the council reception has been closed during Covid 19 and users have accepted alternative means of payment. This will be reinforced by a communications campaign.
22. At the same time, Parking Services will remove those machines that have low usage and hence reduce running costs as part of phase 1, these include:-
- Edinburgh Road x 3 north end levels 1, 2 and 3
 - Church Road x 1 (top end) (seek KCC approval)
 - Recreation Ground Road x 1
 - Elwick Place Car park is converting to a ANPR car park, and the Pay and display machines will be removed as part of that conversion to ANPR

23. The anticipated delivery programme based on key milestones is summarised in the following table:

Recommended phased removal of pay machines	
Phase 1 September 2020	Obtain approval from Cabinet for a phased removal of machines approach. Remove Civic Centre Cash Machines and those listed above.
Phase 2 Early 2021	Remove parking machines x 10 not being used, reduce cost of cash collection and maintenance costs
Phase 3 End 2021	Explore parking machines contactless/ card machines with poor signal and improve as well as machines that are regularly faulty (remove these machines in last phase). This will reduce complaints.
Phase 4 Mid 2022	Remove next batch of 10 parking payment machines - where there are groups, leaving a coin/ card reader / contactless options
Phase 5 Early 2023	Review remaining parking payment machines coin vs cashless takings and remove last of machines, with coin being last to be removed.
During all phases	For all phases reviewing removal , TRO, signage and design costs
During all phases	Marketing strategy with Comms

Conclusion

24. The Cabinet are asked to support the recommendations and allow the officers to work to the programme detailed above to remove cash transactions.

Portfolio Holder's Views

Cllr Feacey– Community Safety and Wellbeing

I support this report based on a phased programme of removing cash from Car Park machines. The programme will be monitored closely to ensure cash is removed at the right time and I commend this report to the Cabinet.

Cllr Bell – IT and Finance

There has been a marked behavioural change due to COVID19 and we have seen retailers actively discourage cash. The Civic Centre machines have been closed for 6 months and there has been a behavioural change in the way people are paying their bills to the Council. I therefore support this report and the removal of cash transactions from the Civic Centre.

Contact and Email-

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Ashford PayPoint locations (this list is not exhaustive)

This shows the widespread availability for options for our customers to continue to pay by cash in the Borough.

Search using the following web address with your postcode for your nearest store:

<https://consumer.paypoint.com/>

Premier, 79 Hythe Road	Open until 23:00
Chocolate Box, 48 High Street	Open until 18:00
Esso, Hythe Road	Open until 23:00
Malthurst Fuels, 18 Beaver Road	Open until 22:00
Zone One, 26a Bank Street	Open until 23:00
Ashford News, 28a County Square	Open until 17:30
Prince International, 132 Beaver Road	Open until 23:00
Co-op, Hunter Avenue	Open until 22:00
Asda Superstore, Kimberley Way	Open until 22:00
Aylesford General Store, 3 Aylesford Place	Open until 23:00
One Stop Stores, 39-41 Beaver Lane	Open until 23:00
NS Convenience Store, 63 Gladstone Road	Open until 23:00
One Stop, George Williams Way, Kennington	Open until 23:59
Ask (Rany) Limited, 62 Gladstone Road	Open until 22:00
Willesborough Stores, 65 Church Road	Open until 21:00
Premier, 101-103 Beaver Lane	Open until 20:00

A & S Stores, 406 Hythe Road	Open until 21:00
Earls Supermarket, 99 Earlsworth Road	Open until 21:00
Ashford Service Station, Brookfield Road	Open until 23:59
Co-op, Brookfield Court	Open until 22:00
Co-op, 98 Faversham Road, Kennington	Open until 22:00
Bungalow Stores, 212 Kingsnorth Road	Open until 23:59
Willesborough Service Station, 405 Hythe Road	Open until 23:59
Co-op, New Chimneys, Godinton Park	Open until 23:59
McColls, 2 Stanhope Court	Open until 22:00
Stanhope Mini Market, 192 Speldhurst Close	Open until 22:00
McColls, 6 The Singleton Centre, Singleton	Open until 22:00
Tesco, Trinity Road	Open until 23:00
Shrubcote Stores. 1-2 The Bungalows, Tenterden	Open until 20:00
Bridgefield Convenience Store, 38 Poppy Mead	Open until 21:00
Nisa, The White House, High Halden	Open until 21:00
Co-op, Churchfield Way, Wye	Open until 22:00
McColls, The Street, Hamstreet	Open until 22:00
Cass's Convenience Store, The Street, Pluckley	Open until 20:00
Co-op, Main Road, Sellindge	Open until 22:00

Equality Impact Assessment

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:

- (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;
- (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;
- (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;
- (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:
- (a) Eliminate discrimination, harassment and victimisation;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership*
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having 'due regard' is about using good equality information and analysis at the right time as part of decision-making procedures.
6. To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:
- removing or minimising disadvantages suffered by people due to their protected characteristics.
 - taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
 - encouraging people with certain protected characteristics to participate in public life or in other activities where it is disproportionately low.
7. How much regard is 'due' will depend on the circumstances. The greater the

potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.

8. In terms of timing:

- Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.
- Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.
- The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Armed Forces Community

9. As part of the council's commitment to the Armed Forces Community made through the signing of the Armed Forces Covenant the council's Cabinet agreed in November 2017 that potential impacts on the Armed Forces Community should be considered as part of the Equality Impact Assessment process.

10. Accordingly, due regard should also be had throughout the decision making process to potential impacts on the groups covered by the Armed Forces Covenant:

- Current serving members of the Armed Forces (both Regular and Reserve)
- Former serving members of the Armed Forces (both Regular and Reserve)
- The families of current and former Armed Forces personnel.

Case law principles

11. A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one so that it needs to be considered not only when a policy, for example, is being developed and agreed but also when it is implemented.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

The Equality and Human Rights Commission has produced helpful guidance on "Meeting the Equality Duty in Policy and Decision-Making" (October 2014). It is available on the following link and report authors should read and follow this when developing or reporting on proposals for policy or

service development or change and other decisions likely to engage the equality duty. [Equality Duty in decision-making](#)

Lead officer:	<p>Maria Stevens Head of Finance and IT</p> <p>Mandy Cracknell Parking, Highways and Transportation Team Leader</p>
Decision maker:	<p>Cabinet</p>
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	<p>To approve the removal of cash machines from the Civic Centre reception.</p> <p>To approve the removal of cash payments at parking terminals, alongside the implementation process for this change.</p>
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	<p>26 September 2020</p>
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	<p>This report cover two matters:</p> <p>Cash machines in Civic Centre The first is in relation to the removal of the cash machines from the Civic Centre reception area.</p> <p>Move to cashless parking The second matter is in relation to moving to a cashless parking service. The report sets out the options for the removal of cash as a payment method for adhoc parking and the pace and extent of the move towards cashless parking.</p> <p>This report has been prepared for members to consider the removal of cash and consequential assistance this will provide in reducing financial pressures by reducing collection costs, machine maintenance and future replacement of machines as they reach end of life.</p> <p>The removal of cash payments is of benefit to the customers as it will maximise convenience and satisfaction, through ease of use and streamlined processes.</p> <p>It also supports the safety of our customers during the Covid-19 pandemic by reducing queues and contact with our machines. The majority of the public have adapted to the behavioural changes that have been accelerated due to the pandemic and have embraced technology and cashless payment options.</p>
Information and research:	<p>Cash machines in Civic Centre Due to the pandemic the customer centre was closed for a substantial period of time and have only recently re-opened for appointments only. This had led to a decline in customers</p>

<ul style="list-style-type: none"> • Outline the information and research that has informed the decision. • Include sources and key findings. 	<p>being able to attend the Civic Centre to pay in cash. They have had to use the alternative payment methods or used a PayPoint outlet. This has led to a change in behaviour of those paying the Council. Due to the council offering other payment methods and places to pay using cash, the removal of these machines should have an indiscriminate effect on our customers.</p> <p>The commercialisation work is also exploring further opportunities for customers to pay for discretionary services such as garden waste and lifeline through a single card payment option.</p> <p>Move to cashless parking</p> <p>We have seen an increase in the use of contactless payments in its car parks since the pandemic and the introduction of RingGo. The users are taking advantage of the simple RingGo app to park with ease and confidence.</p> <p>There are several ways to pay to park with RingGo:</p> <ul style="list-style-type: none"> • By a smartphone application • By calling the phone service • By text message • Through the internet <p>New figures show that drivers in the borough have increasingly been using RingGo when parking in council-owned car parks and also when parking in on-street bays</p> <p>Alongside this, we are reviewing how we administrate on-street parking permits, exemptions and dispensations. As a result of this, a new digital system will be put in place, enabling residents and others to apply for and manage permits online. The system also recognises valid permits from a vehicle's registration number, meaning that you no longer need to remember to display your permits. This virtual permit system is due to be launched shortly and again will improve the customer experience as well as providing online payment options.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> • What specific consultation has occurred on this decision? • What were the results of the consultation? • Did the consultation analysis reveal any difference in views across the protected characteristics? 	<p><i>Please outline the nature of any consultation undertaken, the groups this was with and the protected characteristics represented.</i></p> <p><i>The results should be presented proportionately i.e. for larger consultations analysis of the results may be appropriate, whilst for small-scale consultations a commentary on the results may suffice.</i></p>

<ul style="list-style-type: none"> What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>Ofcom – “Adults media use and attitudes report 2018” – www.ofcom.org.uk</p> <p>Action on Hearing Loss – www.actiononhearingloss.org.uk</p> <p>Ashford Borough Council Parking services knowledge</p> <p>Ashford Borough Council Finance service knowledge</p>
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Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	Medium	Negative (minor)
Middle age	Low	Positive (minor)
Young adult	Low	Positive (minor)
Children	Low	Neutral
<u>DISABILITY</u> Physical	High	Negative (minor)
Mental	High	Negative (minor)
Sensory	High	Negative (minor)
<u>GENDER RE-ASSIGNMENT</u>	None	Neutral
<u>MARRIAGE/CIVIL PARTNERSHIP</u>	None	Neutral
<u>PREGNANCY/MATERNITY</u>	Low	Positive (minor)
<u>RACE</u>	Low	Negative (minor)
<u>RELIGION OR BELIEF</u>	None	Neutral
<u>SEX</u> Men	None	Neutral
Women	None	Neutral
<u>SEXUAL ORIENTATION</u>	None	Neutral

<u>ARMED FORCES COMMUNITY</u> Regular/Reserve personnel	None	Neutral
Former service personnel	None	Neutral
Service families	None	Neutral

<p>Mitigating negative impact:</p> <p>Where any negative impact has been identified, outline the measures taken to mitigate against it.</p>	<p>Different ethnic groups</p> <p>Anyone who does not speak English as a first language may have difficulty using non-cash payment options and may not be able to read the signage.</p> <p>This will be mitigated by the fact that by accessing RingGo through the website allows it to be translated into 80 different languages.</p> <p>If the phased approach is taken then parking terminal payment options will still be available such as debit/credit card.</p> <p>Also our customer services team are used to assisting customers who do not have English as their first language and will continue to use their tools.</p> <p>Customer Services can signpost a local PayPoint for the individual for many payment methods (including in cash) for many Council transactions.</p> <p>Disability</p> <p>While disabled people with Blue Badges will continue to be able to park for free as per our current offer, consideration has been given to those that do not hold a blue badge but have other disabilities.</p> <p>Disabled people may have difficulties using the cashless payment options.</p> <p>Reading information notices and paying for parking using mobile device may cause problems for some, including those with learning difficulties or physical impairments such as hearing loss. Mobile phone technology is continually improving and phones are available for people with a range of disabilities including voice amplification and hearing aid compatibility.</p> <p>One of the UKs largest hearing loss charities “Action on Hearing Loss” states the following: <i>“The increasing availability of smartphone apps for parking payments has been beneficial and helps to avoid situation where people with hearing loss are disadvantaged by not being able to make use of voice call payment systems”.</i></p>
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	<p>There are likely to be some people for whom the existing payment machines are currently considered inaccessible either in distance or operation. A cashless alternative may be particularly beneficial for this group of users. The ability to “top-up” parking fees rather than returning to the vehicle to do this will benefit those with mobility issues.</p> <p>The full range of payment options will ensure the widest possible accessibility for most disabilities.</p> <p>Older people</p> <p>It is recognised that older people will be less likely to have a mobile phone or ability to set up an online account. The Ofcom report indicates that 78% of 65-74 year olds use a mobile phone, whilst only 39% of over 65s use a smartphone (increased from 28% in 2016). It should be remembered that payments can be made via text or phone call. A smartphone is not essential.</p> <p>Parking machines will still be available for card payments under the phased scheme and most car owners pay insurance through bank accounts.</p> <p>For those with difficulty in walking or consider the pay machines difficult to access, phone payments can be made easier and safer from the comfort and convenience of a vehicle.</p>
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Is the decision relevant to the aims of the equality duty?	
Guidance on the aims can be found in the EHRC’s Essential Guide , alongside fuller PSED Technical Guidance .	
Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	NA
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	NA
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	NA

<p>Conclusion:</p> <ul style="list-style-type: none"> Consider how due regard has been had to the equality duty, from start to finish. 	<ul style="list-style-type: none"> The due regard for equality has been considered throughout this report. The negative impacts have been negated as detailed above and the impact on protected characteristic will be reviewed throughout the process and if required further adaptations can be made.
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<ul style="list-style-type: none"> • There should be no unlawful discrimination arising from the decision (see guidance above). • Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any residual impacts are justified. • How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported? 	<ul style="list-style-type: none"> • There is no unlawful discrimination arising from this report • The proposals are not considered to have any impacts on equality and will provide customers with easier and safer payments options. The negative impacts have been mitigated as explained above. <p>Monitoring will be completed through:</p> <ul style="list-style-type: none"> • analysis of payment data • customer surveys • attendance at relevant community forums during the implementation period • monitoring of complaints and review of processes
<p>EIA completion date:</p>	<p>27th August 2020</p>