

Improving People's Lives

# **Equality Impact Assessment / Equality Analysis** (Version 4)

Item name	Details
Title of service or policy	Review of on-street resident parking permit charges
Name of directorate and service	Place - Environmental Services – Parking Services
Name and role of officers completing the EqIA	Andrew Dunn, Team Manager - Parking
Date of assessment	16 July 2025

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable**. It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

### 1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<ul> <li>1.1 Briefly describe purpose of the service/policy e.g.</li> <li>How the service/policy is delivered and by whom</li> <li>If responsibility for its implementation is shared with other departments or</li> </ul>	An increase in the baseline charge for on-street parking permits from £100 to £120 for an annual permit, with corresponding increase across bands where permits charges are emission based.  The baseline permit charge has not increased for over 10 years, despite
organisations  ■ Intended outcomes	ongoing inflationary pressures. An increase in the charge helps to ensure that additional costs to the council in implementing, managing and enforcing permit schemes are covered by those that own or drive vehicles, and not by all residents, who as taxpayers, may not own or cannot afford to own a vehicle.
	An increased baseline charge will also proportionality increase the cost of a permit for more polluting vehicles; further helping to encourage behaviour change and reduce air pollution caused by private vehicles, whilst also reducing the emission that cause climate change.

It's also proposed that the 50% discount applied to a permit purchase for EV vehicles is removed and that a mechanism to consider an annual review linked to inflation is introduced.

The service provides eligible residents, businesses and motorists working in the community, who require access to on-street parking facilities, particularly within residents parking schemes, with parking authorisation via a parking permit.

The service works by allowing authorised users (permit holders) to park in various locations throughout the geographical area of Bath & North East Somerset Council where parking restrictions apply.

#### The scheme:

- responds to increasing demand for residents only parking zones and permit holders only parking, whilst ensuring that the administration and enforcement of these schemes is as effective and efficient as possible and cost neutral.
- reduce the current high levels of commuter parking in residential areas
- encourage the use of alternative transport by restricting the amount of available parking within Bath City
- help to ensure that people who need access to residents or businesses within residential parking zones can do so.

1.2 Provide brief details of the scope of the policy or service being reviewed, for example:

- Is it a new service/policy or review of an existing one?
- Is it a national requirement?).
- How much room for review is there?

The system provides improvements to customer service over paper permits and reduces public sector costs by encouraging customers to self-serve, reducing the use of copied permits, whilst also helping to reduce fraud and system abuse.

The system supports freedom and fairness and is targeted at addressing the parking needs of those people who live and work in Bath & North East Somerset Councils geographical area.

	This is a review of existing permits pricing policy, with permits issued in line with the Traffic Management Act 2004 to allow enforcement of residents parking zones and other restrictions.
	Entitlement to a permit or the physical layout of resident parking zones and the different types of restrictions they may contain are not within scope.
	It is not a national requirement and there is room for review.
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	This Policy is in line with Transport Polices and the Parking Strategy and the Residents Parking Scheme Strategy. It is consistent with (although is not designed to promote) the objectives of the Climate Emergency and Clean Air.

# 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<b>2.1</b> What equality focussed training have staff received to enable them to understand the	All staff within Parking Services have completed Equalities training as this is mandatory for all B&NES officers their induction to ensure compliance with corporate standards.
needs of our diverse community?	A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment. The team also receive Equalities training provided by our Corporate Equalities Officer to maintain and refresh knowledge.
2.2 What is the equality profile of service users?	Anyone who requires parking within the geographical area of Bath and North East Somerset can potentially purchase parking, therefore the service users are likely to be representative of the national population that travel by private vehicle. <a href="https://www.bathnes.gov.uk/strategic-evidence/document-library/bath-and-north-east-somerset-ward-profiles">https://www.bathnes.gov.uk/strategic-evidence/document-library/bath-and-north-east-somerset-ward-profiles</a>

2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 32 survey (2023/24) record the following proportion of respondents that expressed a satisfied or neutral view to the provision and operation of the relevant service:  57% for on street parking areas  69% for parking permits
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	Consultation was undertaken in 2024/25 as part of the council's spending plans for the financial year 2025-2026, <a href="https://www.bathnes.gov.uk/budget-consultation-2025-2026">https://www.bathnes.gov.uk/budget-consultation-2025-2026</a> Further consultation will be undertaken via the TRO processes, which requires a minimum period of 21 days.
2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?	Consultation will be undertaken via the TRO processes, which requires a minimum period of 21 days and will include relevant questions where appropriate regarding Equalities and Diversity to ensure consideration is given to all sections of the community when decisions are undertaken.  Existing permit holders, where email or telephone numbers contact details are held, will be contacted directly to inform them of the consultation, with additional notices published in the local press.  Accessible formats available on request or where a need is already known Paper copies will be made available in One Stop shops/ Library services  Central phone number will be provided to ensure that people impacted by digital exclusion can participate.

## 3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

• Meets any particular needs of equalities groups or could help promote equality in some way.

• Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	Permits are available to all that are eligible and can be purchased online (24/7) via a WCAG 2.2 compliant website, over the telephone or in person at council one stop shops.  Parking Services (5 days a week) and MiPermit (7 days a week) operate telephone lines to support customers with queries or their purchase. Permits can be purchased in duration of 12, 6, 3 and 1 month.  Paper visitor permits remain available upon request for customers in old scheme areas or as a reasonable adjustment in more recent schemes.  Free limited waiting and loading bay provision is made available across the scheme areas for motorists that may need to park but cannot obtain a permit.  The proposed removal of the EV discount more equitable rebalances the contribution towards the operational costs of a scheme as the discount is only available to households that can afford to purchase or maintain a more expensive EV vehicle.	Some customers may be concerned about their data privacy using an online digital service, noting the recent high profile national breaches experienced by Marks and Spencer's and The CO-OP. MiPermit is a PCI DSS Level 1 compliant organisation. This is the highest and most stringent level of Payment Card Industry Data Security Standard (PCI DSS) compliance. It applies to merchants processing over 6 million card transactions annually or those deemed highrisk by card brands. Level 1 compliance requires an annual on-site audit by a Qualified Security Assessor (QSA) and quarterly network scans by an Approved Scanning Vendor (ASV)  The Bath Active Travel Masterplan is a comprehensive strategy aiming to transform how people travel in Bath and North East Somerset by prioritizing walking, cycling, and other forms of active travel. It seeks to create a network of safe, accessible, and convenient infrastructure for active travel, ultimately reducing reliance on cars and promoting healthier, more sustainable communities.
<b>3.2 Sex</b> – identify the impact/potential impact		Whilst there is no intended impact - all who qualify regardless of sex are able to purchase a permit

of the policy on women and men.

through MiPermit; it is acknowledged that there is inequality within the gender pay gap so women are more likely to earn less than men and more likely to be care givers so have reduced income.

The Bath & North East Somerset (B&NES) Active Travel Masterplan aims to increase active travel options like walking and cycling, providing better access to alternatives to private car ownership, with a focus on addressing gender disparities in their use. The plan acknowledges that women are less likely to cycle than men. To address this, the plan includes initiatives to make active travel safer, more accessible, and more appealing to all, regardless of gender.

Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.

This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles.

3.3 Pregnancy	and
maternity	

Whilst there is no intended impact - all who qualify are able to purchase a permit through MiPermit; it is acknowledged that being pregnant or on maternity leave may impact on household income. Access to car parking may be required for new parents who will have additional resources to carry (baby, car seats, baby carrier, pushchairs/prams/ nappy changing and feeding resources).

Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.

This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles.

National exemptions for loading and unloading apply which enable people to park on single and double yellow lines (except where a loading ban is in place for safety reasons) to unload bulky items and to also allow people to board and alight. In the context of vulnerable people, including young

	children and infants, these may be escorted to their destination.
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	Whilst there is no intended impact - all who qualify regardless of gender are able to purchase a permit through MiPermit; it is acknowledged that individuals experiencing gender dysphoria may have poorer mental health as discrimination, familial rejection and societal inequality can continue impact the well-being of trans individuals even after transition.  Research consistently shows a link between lower income and poorer mental health outcomes and therefore this group may be disproportionately impacted by a rise in permit costs.
	The Bath & North East Somerset (B&NES) Active Travel Masterplan aims to increase active travel options like walking and cycling, providing better access to alternatives to private car ownership, with a focus on addressing gender disparities in their use. The plan acknowledges that women are less likely to cycle than men. To address this, the plan includes initiatives to make active travel safer, more accessible, and more appealing to all, regardless of gender.
	Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the

option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.

This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles.

3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)

Parking Services can assist customers applying for and renewing permits both at Council One Stop Shops, which now include greater support for assistance with online services and over the telephone through the dedicated service provided by MiPermit allowing the customer to be assisted by a member of staff, charged at local call rates and included in most mobile providers free minutes (variations based on personal contracts may apply).

On-street permits do not impact on disabled people that hold a Blue Badge as they are currently entitled to park in all on street residents permit bays and pay and display bays within B&NES without displaying a permit or a pay and display ticket provided a valid blue badge is clearly displayed.

A Blue badge also allows up to 3 hours of parking when parking on yellow lines where no loading restrictions are in place.

Customers which do not qualify for a Blue badge but who may have difficulty accessing or using online/App based services may contact the council or MiPermit for assistance with their permit (see 3.1 above).

Residents of a permit scheme area who hold a Blue Badge are entitled to a permit free of charge.

The UK Parliament is actively addressing the disability pay gap through consultations and proposed legislation, notably within the Equality (Race and Disability) Bill. This bill includes provisions for mandatory disability and ethnicity pay gap reporting for larger employers, aiming to create a more equal society and support economic growth. The consultation process seeks input on how to gather meaningful data and ensure it's used effectively by employers to address the disparities.

This indicates that disabled people experience pay discrimination at work, therefore disabled

A Blue badge also allows up to 3 hours of parking people that do not qualify for a Blue Badge may when parking on yellow lines where no loading be disadvantaged by the increased costs for restrictions are in place. parking permits. Residents of a permit scheme area who hold a Even with the higher proposed costs for a permit, Blue Badge are entitled to a permit free of charge. enabling the schemes to be cost neutral, these costs equate only to a small percentage of the Disabled people, who meet the criteria, can annual costs of running a motor vehicle. The daily obtain a free Diamond Travelcard which will increase in permit costs to £0.05 to £0.11 per day enable free bus travel on all local bus services, or for a first permit. The council introduced the option for resident to purchase a 1 and 3 month discounted travel on community travel schemes. https://beta.bathnes.gov.uk/applying-free-buspermit to help make them more affordable and pass-diamond-travelcard flexible. This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles. 3.6 Age - identify the Parking Services can assist customers applying We are encouraging our customers to self-serve, impact/potential impact and renewing permits both at Council One Stop however this may impact on older customers, who of the policy on different Shops and over the telephone. may prefer to deal face to face with a member of staff. We still operate face to face therefore these age groups Community transport schemes operate across customers will not be disadvantaged. Bath and North East Somerset to provide safe, accessible transport for people who cannot use Customers who have difficulty accessing/using public transport due to disability, age or lack of online/App based services may contact MiPermit access to services. More information on these by telephone for assistance 7 days a week to can be found online at purchase ad hoc parking. https://livewell.bathnes.gov.uk/community-Paper visitor permits remain available upon transport request for customers in old scheme areas or as a reasonable adjustment in more recent schemes.

	People of qualifying age, or who have certain disabilities, can obtain a free Diamond Travelcard which will enable free bus travel on all local bus services, or discounted travel on community travel schemes.  https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard	
3.7 Race – identify the impact/potential impact on across different ethnic groups		Whilst there is no intended impact - all who qualify regardless of race can purchase a permit through MiPermit; it is acknowledged that there is inequality due to the ethnicity pay gap, which means that ethnic minority groups or individuals are more likely to earn less than white British groups or individuals so may be adversely impacted.  Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.  This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles.

Whilst there is no intended impact - all who qualify regardless of marital or civil partnership status can purchase a permit through MiPermit; it is noted that they may be more likely to own more than one vehicle, and therefore experience a greater impact of increased costs, for the purpose of convenience and to support greater flexibility and independence in daily routines. However, there is no definitive data to indicate that couples in marital or civil partnerships do own more than one vehicle.
Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.  This impact has been considered against the

3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles.  There is no known impact— all who qualify regardless of their religion or belief can purchase a permit via MiPermit.  Resident parking schemes apply 7 days a week.  Free limited waiting and loading bay provision is made available across the scheme areas for motorists that may need to park but cannot obtain
3.11 Socio- economically disadvantaged* — identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal	Permits can be purchased in duration of 12, 6, 3 and 1 month, with short durations reducing the purchase cost and increasing the flexibility.  The proposed removal of the EV discount more equitable rebalances the contribution towards the operational costs of a scheme as the discount is only available to households that can afford to purchase or maintain a more expensive EV vehicle.	There is no intended impact based on socioeconomically disadvantage- all who qualify are issued a permit.  Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.
requirement, but is a local priority).		This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater

	access to kerb space near to their homes for parking of private vehicles.  A member of the public is free to park their vehicle anywhere on the highway where the restrictions do not forbid them from doing so and if they are not classed as being an obstruction to which the Police would enforce as a criminal matter.
3.12 Rural communities* identify the impact / potential impact on people living in rural communities	No known impact— all who qualify can purchase parking permits via MiPermit.  Free limited waiting and loading bay provision is made available across the scheme areas for motorists that may need to park but cannot obtain a permit.  A member of the public is free to park their vehicle anywhere on the highway where the restrictions do not forbid them from doing so and if they are not classed as being an obstruction to which the Police would enforce as a criminal matter.  The
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by	Whilst there is no intended impact - all who qualify can purchase a permit through MiPermit; it is noted that members of the armed forces community may be more likely to be mobile and living in areas for short periods.

Even with the higher proposed costs for a permit, law to pay due regard to the Armed Forces enabling the schemes to be cost neutral, these Community when costs equate only to a small percentage of the annual costs of running a motor vehicle. The daily developing policy, procedures and making increase in permit costs to £0.05 to £0.11 per day for a first permit. The council introduced the decisions, particularly in the areas of public option for resident to purchase a 1 and 3 month housing, education and permit to help make them more affordable and healthcare (to remove flexible. disadvantage and consider special This impact has been considered against the wider needs of managing and administering a provision). scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles. 3.14 Care Experienced Whilst there is no intended impact - all who qualify can purchase a permit through MiPermit; it is noted that the higher costs of living are This working definition is currently under review significantly impacting the lives of careand therefore subject to experienced young people, exacerbating existing challenges and creating new ones related to change: mental health, housing, and financial In B&NES, you are stability. Many may struggle to afford basic 'care-experienced' if you necessities and face increased debt spent any time in your childhood in Local Even with the higher proposed costs for a permit, enabling the schemes to be cost neutral, these Authority care, living away from your costs equate only to a small percentage of the parent(s) for example, annual costs of running a motor vehicle. The daily you were adopted, lived increase in permit costs to £0.05 to £0.11 per day for a first permit. in residential, foster

care, kinship care, or a special guardianship arrangement.	The council introduced the option for resident to purchase a 1 and 3 month permit to help make them more affordable and flexible.		
	This impact has been considered against the wider needs of managing and administering a scheme to help ensure that residents had greater access to kerb space near to their homes for parking of private vehicles.		
	A member of the public is free to park their vehicle anywhere on the highway where the restrictions do not forbid them from doing so and if they are not classed as being an obstruction to which the Police would enforce as a criminal matter.		

<sup>\*</sup>There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

# 4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

<sup>\*\*</sup> The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

<sup>\*\*\*</sup>The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed after consultation has closed to consider feedback from respondents.	To review the EIA.	EIA Reviewed.	Team Manager – Parking Services	2025/26 after the consultation closes and before decision is made.

# 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by**: Chris Major – Director of Place Management (Divisional Director or nominated senior officer)

**Date: 22 July 2025**