City of York Council

Equalities Impact Assessment

Who is submitting the proposal?

Directorate:		Place		
Service Area:		Parking Services		
Name of the proposal :		Cashless parking decision		
Lead officer:		Graham Titchener		
Date assessment completed:		27-12-2023		
Names of those who	contributed to the asse	ssment :		
Name	Job title	Organisation	Area of expertise	
Graham Titchener	Parking Services	CYC	Parking and areas covering this proposal including economic development	
Dave Smith	Community Officer	CYC	Accessibility and disability	

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	This proposal is to assess any impacts on the public in line with the Equality Act for the implementation of options the following items that are being put forward for a decision by the Executive Member for Economy and Transport:-
	a) To note the cashless consultation findings
	b) Remove the acceptance of cash payments across the parking estate (on street and car parks)
	c) Remove the acceptance of cash payments for parking across the parking estate (on street and car parks) except for 1 car park only
	d) Remove the acceptance of cash payments for parking across the parking estate (on street and car parks) except for 2 car parks only
	e) Remove the acceptance of cash payments for parking across all on street locations but retain cash payments in all car parks
	This Assessment is to review the impacts of these initiatives on those who have protected characteristics and help inform the political decision put before the Executive Member for Economy and Transport.

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	Yes, the turning off of the 3G network.
	Equalities Act and the impacts of moving to cashless payments only.
	The York Traffic Regulation Order will need to be changed.

1.3 Who are the stakeholders and what are their interests?

All motor vehicle users and York residents who pay for their parking, especially those who choose or can only pay by cash. To note that those with a disabled blue badge can park for free in any car park, resident parking zone or on street pay and display bay, therefore any decisions made in this report will not impact on them directly but may on any visitors or carers they may have.

For those who can only pay by cash for their own reasons ranging from those who don't have a bank account, cash payment card, those in abusive relationships were paying by cash means they don't leave a trail for the abusive partner to track their spend and those who simply don't know or fear using digital means to pay for goods and services.

For those who can only pay by cash and do not have a disabled blue badge it will likely mean their use of a private vehicle to come near or into the city centre will be heavily impacted on especially for those who can only use their own private vehicle for their own reasons, for example those with specific access needs or/and wheeled equipment.

Whilst not for this report, the procurement of new parking ticket and pay on exit machines and equipment to refurbish the older parking machines is positive. The older and even the newer machines can be confusing to use by some customers and with dimly lit displays and just generally the older machines

looking quite used and battered. The procurement of new machines and equipment to refurbish them will help to not only save costs in the medium and long term, such as reducing maintenance costs, but ensure the machines are much clearer and simpler to use for all customers.

If the decision is to remove the use of on street parking machines, it will have an impact on those with more severe mobility issues who don't have a disabled blue badge and don't use mobile phone applications (such as the Pay by Phone service). While customers can call the pay by phone service operator, it will clearly make it more difficult for customers to pay for their parking, especially those in some of these protected characteristics.

While now a decision for this report it is worth noting a review and upgrade of the parking ticket machines is necessary due to the age, cost of maintenance and especially the 3G network being turned off, impacting on machines that can only operate of 3G and 2G. So there will have to be some changes but this EIA, the results of the cashless consultation and the financial information the Council provided in the accompanying Executive Member Decision report, will need to take all this into account, which will impact on the type of machines we procure for example do they need to accept cash or not.

1.4 Who are the stakeholders and what are their interests?

CYC Executive: -

those requesting this work and the cashless consultation

Car park and on street parking users:-

- going fully cashless or reducing cash use will impact on those who currently use cash to pay for their parking.
- Removal of the use of parking ticket machines for all on street parking locations

Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.			
Source	e of data/supporting evidence	Reason for using		
Liaising with other councils to get an overview of their thoughts on cash taking for parking and their plans to review phasing out the acceptance of cash payments.		To show that York is not the only Local Authority considering moving to cashless payments only for parking due to significant drops in cash being used to pay for parking Whilst a number of London Borough Councils have moved to cashless payments including pay by phone only on streets, I have spoken to Brighton & Hove as well as Gloucester County Councils. Due to the reasons of cash use dropping so significantly and the cost of replacing and repairing parking ticket machines, they no longer accept cash on street. There are still a few main car parks that accept cash but this is with a view to phase this out also. In the report it lists other councils that I have found to be going down these lines but there is a general acceptance that the costs associated with the collection and reconciliation of cash use is an increasing factor for many councils. addition it should be said that the private sector is also moving down this line of not accepting cash where an internet search shows NCP only seem to accept online and card payments only.		
Use of parking payment providers information		As above		
Public co	onsultation and direct consultation with older peoples groups and associations	The consultation was given a significant boost in promotion from social and printed media including stickers on all parking ticket machines to highlight this consultation to the public. This was also sent to all gatekeepers of the various protected characteristic groups. In short it is more likely that older people are used to using cash and less		

as other characteristics such as those who are disabled but do not have a blue badge and those in abusive relationships and not wanting their spending to be tracked, there was a general view that using cash helps people budget their spend. While a large proportion of respondents did/can use digital forms of payment a majority preferred cash to still be accepted where budgeting was the main reason. The idea however of moving to pay by phone only, generated other concerns such as if the mobile network drops out and the risk of being fined. However the main point was the cost of using the App over cash and other card/contactless payments. It has always been clear that there will be some members of the public disadvantaged by a decision to go cashless and for some it will mean they can no longer pay for their parking. As this EIA shows and the report, there has been some Government studies over this where it is recognised this is a growing concern from those that provide a service and the cost of accepting cash where it is evident that cash use is significantly falling compared to digital forms of payment.

inclined to use cashless payment methods and for some the fear or just generally not being tech savvy enough to use digital forms of payment, especially and App. As well

General information in the public domain over cash use

To provide a context to the changing environment we are in to support this initiative to move to a cashless service.

A trawl through the internet shows there is no conclusion or steer from the Government over the use and acceptance of cash other than it is not a legal right to protect the use of cash, however from a Parking perspective it is still in legislation that a penalty charge notice (PCN (parking fine)) has to have a system in place to allow for the customer to pay for their PCN via cash.

The national audit office produced a report on the 18th September 2020 titled 'The production and distribution of cash' that showed there is a significant decline in cash where the opening line into the conclusion of the report (that can be found via the link below) was "The declining use of cash is placing increasing pressure on the sustainability of the infrastructure for producing and distributing cash."

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	The production and distribution of cash - National Audit Office (NAO) report This statement also reflects the questions we as a Council are asking where the costs and pressures to still accept cash will only increase and where the political acceptance will need to draw a line in how much the council is willing to pay to continue to accept cash.
Stakeholder Engagement	Working through the Council Community's team, key stakeholder groups who would be most impacted on by the removal of cash and on street parking ticket machines. This included elderly and disability representative groups and their Chairs. Initial engagement including direct emails to the chairs and members of the groups and a presentation and Q&A session with the York Access Forum. In turn this informed the city wide public consultation on moving to cashless and how this could be distributed and made sure it was as inclusive as possible.
	Promotion of this consultation was extensive including through all the gatekeepers of all the city representative groups. Posts in all libraires, printed and social media and stickers on all parking machines across the parking estate,
	There were hard copies produced and distributed, made into easy to read and BSL formats.
	In addition to these comments from the groups, officers leading on disabilities further informed the consultation and questions asked.
	The consultation has been summarised within the consultations return spreadsheet and comments linked to the overall question added under their own separate tabs in this spreadsheet prior to the detailed responses of each question answered. Following a read through summaries of the main comments have been added to the summary

section alongside each question and added to the accompanying Executive Member Decision report.
This will be added as part of a number of annexes to this report and published.

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and unindicate how any gaps will be dealt with.	nderstanding of the impact of your proposal? Please		
Gaps in data or knowledge		Action to deal with this		
stop or	r view on what other local authorities views is to reduce the acceptance of cash as a payment for and their work on moving to cashless	Liaise with LA groups and pay providers		
minorit majorit	the consultation produced a good return rate this y of parking users are not conclusive for the y of parking customers where we have well over a parking transactions per year.	In addition to the consultation findings we have to rely on the financial picture we have for York where the percentage of cash payments has dropped significantly over the years down to a current figure of 8% of parking transactions are by cash for York.		
Impacts on those with protected characteristics under the Equality Act.		Data has been reviewed from the consultation and summarised for the key findings and presented in the Executive Decision report. However the data from the consultation needs to be reviewed by an expert in equalities legislation to ensure all potential issues are identified and fed back in this assessment.		

Step 4 – Analysing the impacts or effects.

sharii adjus	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.					
Equality Grou and Human Rights		Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)			
Age	This group is considered to be the most hard hit if the council moves to cashless following the consultation review by members of the Older People's Assembly and with the general understanding that more older people find it difficult to uses of digital technology compared to other characteristics.	-	Н			
	The decision to remove the use of machines will likely have a high effect given the individual will need to use the pay my phone service. While it was not seen in the consultation responses those with significant mobility issues such as those who are ambulant disabled may not be able to walk far and an even smaller number not have a blue badge. Further work and expertise will be needed to fully assess this.	-	Н			
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to more easily use this new equipment. The specification of this will ensure much clearer displays and layout are used where specialists	+	М			

	views, such as those in the Councils Community team, will be sought.	
Disability	For those with a disabled blue badge the impacts of these recommendations will be minimal given blue badge holders can park from free in any car parks, on street pay for locations and resident parking zones.	Н
	Where it is considered to be an issue is for those with disabilities who do not have a blue badge. This scoring reflects those without a blue badge including carers who help and provide care for those with disabilities who may only use cash. While it was not seen in the consultation responses those with significant mobility issues such as those who are ambulant disabled may not be able to walk far and an even smaller number not have a blue badge. Further work and expertise will be needed to fully assess this.	H (for those without a blue badge)
	The decision to remove the use of machines will have a moderate effect given the individual may not have a phone to use the pay by phone service. This will range from low to high.	Н
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily. The specification of this will ensure much clearer displays and layout are used where specialists views, such as those in the Councils Community team, will be sought.	M

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Gender	During the development of the consultation, preliminary work with these groups highlighted one group of people who may be disadvantaged by moving to cashless only, which are those in domestic abusive situations where the abusive partner or group can track the individuals spend through digital payment methods, where cash can be used anonymously. This is likely to impact more of females than males. However it should be noted that not all domestic violence (DV) situations are between two partners. DV can be committed between family members such as misogyny/misandry homophobia, disablism, racism, honour crimes, inter disability, between work colleagues etc. Indeed any interaction between two or more people and groups where tracking or stalking can take place.	-	M
	Subject to further expertise in domestic violence, it is considered to be in a minority of the general populous subject to an experts view. Nonetheless the fear of those in these situations where this level of controlling behaviour is present means this will have an impact on those who drive and park but with the availability of cash payment cards that do not require any bank account or identification does help to mitigate the removal of cash from the parking estate. The decision to remove the use of machines will have a	-	M
	moderate effect given the individual may not have a phone to use the pay by phone service.	-	IVI

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	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to more easily use this new equipment.	+	L
Gender Reassignment	This is linked to the above statement for Gender where someone may choose to be assigned as a female and find themselves in an abusive partnership with a group or individual who wishes to control them and their spend. As this is a small minority compared to other women this is considered a medium risk. Domestic violence and public violence is likely to occur still for this group that does not only apply to women but all genders and sexuality preferences, albeit it is deemed to a lesser extent.	-	M
	The removal of the use of parking ticket machines where disability isn't a factor is considered neutral that will also need to keep in mind the individuals ability to use digital payment methods.	0	L
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	L
Marriage and civil partnership	These decisions will impact on individuals in general. There is nothing that can be identified that would impact this group specifically by being in a marriage or civil partnership. Those in an abusive partnership (as mentioned under	-	M
	Gender) may be impacted on this however depending on how abusive and controlling the partner can be. It is		

	considered that LGBTQ+ groups will need to be approached to help inform this section.		
	The removal of the use of parking ticket machines where disability isn't a factor is considered neutral that will also need to keep in mind the individuals ability to use digital payment methods	0	L
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	L
Pregnancy and maternity	Moving to cashless may well impact on those who are in tight budgets that may be impacting on with the arrival of a new child. Also those in an abusive partnership (as mentioned under Gender) may be impacted on this however depending on how abusive and controlling the partner can be.	-	Н
	The decision to remove the use of machines will have a moderate if they do not currently use the pay my phone service.	-	M
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	L
Race	These decisions will impact on individuals in general. There is nothing that can be identified that would impact this group due to someone's race for moving to cashless.	0	L

	The removal of the use of parking ticket machines where disability isn't a factor is considered neutral but the need to keep in mind the individuals ability to use digital payment methods.	-	L
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily, including more easily those whose first language is not English.	+	M
Religion and belief	These decisions will impact on individuals in general. There is nothing that can be identified that would impact this group due to someone's belief as it is believed there are no faiths that dictate to its followers you much only use cash.	0	L
	The removal of the use of parking ticket machines where disability isn't a factor is considered neutral that will also need to keep in mind the individuals ability to use digital payment methods	0	L
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	L
Sexual orientation	These decisions will impact on individuals in general. However this is linked to the above statements for Gender and Gender Reassignment where someone depending on their sexual orientation may find themselves in an abusive	-	L

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	partnership with a group or individual who wishes to control them and their spend. As this is a small minority compared to other women this is considered a medium risk. Domestic violence and public violence is likely to occur still for this group that does not only apply to women but all genders and sexuality preferences, albeit it is deemed to a lesser extent.		
	The removal of the use of parking ticket machines where disability isn't a factor is considered neutral that will also need to keep in mind the individuals ability to use digital payment methods	0	L
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	L
Other Socio- economic groups including:	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	For those providing care, this could impact on those needing to park in on street locations where there currently may be a pay and display bay they park in and pay for their parking through cash means only. While it is a small risk, the reduction in provision to pay for parking on street may move carers to find alternative provision and increase their travel time. However depending on the person who requires care and if they live in a resident parking zone, the resident may have a free attendance permit so the carer would not need to	-	L

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	pay for their parking and park close by to the resident they are providing care for.		
	However for those people they provide care for but who don't have a disabled blue badge, the lack of availability to pay for their parking with cash who have some impact on them but not as much as other groups where they should have a wider variety of access and ability to use digital payments.	-	L
	The decision to remove the use of machines will have a moderate if they do not currently use the pay my phone service		
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	M
Low income groups	This may well impact on this groups who for budgetary or other reasons may only be able to use cash. The public consultation captured views where it was found that paying for cash allowed customers to better control their spend and budget. For those on low incomes this is especially important. In short the impact on this group could be quite considerable if they can only pay by cash then they might not be able to use any of the council parking facilities in York. Risking removal of access to services, reducing their choices and may lead to social isolation.	-	Ħ

	The decision to remove the use of machines will have a moderate if they do not currently use the pay my phone service.	0	L
	Positively the procurement of new machine and equipment to refurbish old machines will help those in this group to more easily use this new equipment	+	L
Veterans, Armed Forces Community	These decisions will impact on individuals in general. There is nothing that can be identified that would impact this group due to their current or previous military service. For those injured or disabled in the line of duty, please see the disabled group section.	-	L
	The removal of the use of parking ticket machines where disability isn't a factor is considered neutral that will also need to keep in mind the individuals ability to use digital payment methods However for those in this group who are disabled but without a blue badge this will have an impact depending on their situation.	0	L
	Positively the procurement of new machine and equipment to refurbish old machines will bring improvements to what we currently have and help those in this group to use this new equipment more easily.	+	L
Other			
Impact on human rights:			

List any human rights impacted.	As there is no legal requirement to have accept cash to pay for your parking, except for paying a parking fine (PCN).	-	М
	However for those in key effected groups, such as 'Age, 'Disabled' and 'Low incomes' these are likely to be the most impacted on. The consultation had many people from different groups and situations including those who do use digital payment methods but wanted to see cash acceptance retained. This mainly came from the point of view to help better control spend and balance an individual's budget but also citing other reasons such as the network dropping out to pay for parking and risking getting a parking ticket.		
	So while it is deemed there are no human rights impacts given the law does not state you have to allow for the provision to pay for parking with cash except for parking tickets (PCNs) that already have a cash option, this impacts more of equalities for those who choose or can only by cash.		
	It should be noted that there is of course the option to buy a cash card that can be used on a card or contactless facilities.		
	However this section of the assessment should be referred to the Centre for Applied Human Rights.		

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups

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- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

High impact (The proposal or process is very equality relevant)	There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.
Medium impact (The proposal or process is somewhat equality relevant)	There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to contribute to promoting equality and the exercise of human rights
Low impact (The proposal or process might be equality relevant)	There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights

Step 5 - Mitigating adverse impacts and maximising positive impacts

Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?

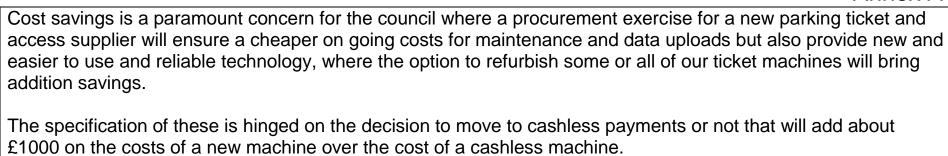
I am not aware of any unlawful impacts on these decisions so this is deemed as a low impact for any unlawful prohibited conduct. There will be adverse impacts on a number of the groups listed in this EIA where the cashless decision will have the biggest impact on those who choose or can only use cash. So a legal and expert view on the impacts of this decision to remove cash as a payment option and the removal of the use of parking machines for on street, will need to be assessed against the Equalities Act.

There clearly needs to be due regard from the Public Sector Equality Duty and the Councils responsibility to provide services to disabled people to ensure they can use and get access to services in an equitable way and where necessary provide migration (reasonable adjustments) where there is a lack of equality. For example disabled people or those with health conditions that are affected by a disability but do not qualify for a blue badge.

Where the impact is more widespread, in reviewing the consultation findings, is if we move to pay by phone only in many of our on street locations. The feedback from this highlights the need for some but desire by others, to use cash to help them budget and monitor their spend. For some the risk of the network dropping out and then not having any other way to pay was a concern that led onto comments of the fear of being issued a parking fine.

These 2 main points will need to be considered by the Executive Member when deciding on this report.

There is the option to bring in the PayPoint system through the pay by phone service however the cost for this is quite high. Some Local Authorities who have decided to go down these lines for the interim to have the PayPoint option to allow customers to pay for their parking by cash but again the use of this is very low representing less than 1% with the Local Authorities I have spoken to and the pay by phone provider.



Step 6 – Recommendations and conclusions of the assessment

- Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
 - **No major change to the proposal** the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.

- **Adjust the proposal** the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination, it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
At this starting point this selected option is to Continue with the proposal. Following the consultation, it is likely this option will move to Adjust the proposal	As this is an instruction by the previous Administration's request to explore cashless and that led to the taking of the cash collection costs as savings, the decision has been made. However the Executive Member can overturn this but the savings will need to be found elsewhere and the decision taken to the Executive given this is a budgetary decision impact.
To continue with the proposal. Following the consultation the Executive Member for Economy and Transport will need to	The finance data the council has is robust and clear where the majority of users will be impacted on very little and be able to make the move (if not already) onto cashless payment methods only.

consider these and decided if any adjustment to the proposal may be required but this is a political decision.

As blue badge holders can park for free when displaying their blue badge, so those without a blue badge that are disabled, those in the older aged group and a small minority who are in abusive situations that depend on the use of case for anonymity, will be impacted on.

For others who simply choose to use cash, this will have a less significant impact but the reality of the financial situation the council is in will need to be weighed up with the consultation findings.

However in light of the consultation results, this has informed further options to reduce cash acceptance from car parks rather than eliminate it so this and this EIA has adjusted the proposal where the <u>additional</u> options are:-

- C) Remove the acceptance of cash payments for parking across the parking estate (on street and car parks) except for 1 car park only
- D) Remove the acceptance of cash payments for parking across the parking estate (on street and car parks) except for 2 car parks only
- E) Remove the acceptance of cash payments for parking across all on street locations but retain cash payments in all car parks

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Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.				
Impact/issue	Action to be taken	Person responsible	Timescale	
Public Consultation	Review the options in the report and discuss these with the Director and Executive Member prior to the report being published taking into account these and possibly other compromises.	Graham Titchener and James Gilchrist	Prior to the February Executive Member for Economy and Transport Decision session	
Revenue to reduce the fees for using the Pay by Phone service	Work with Finance and the Pay by Phone supplier to reduce the costs of using this service to make it more attractive to customers.	Graham Titchener/CYC Finance	Prior to the February Executive Member for Economy and Transport Decision session	

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Step 8 - Monitor, review and improve

8. 1 How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?

Analysis of the public consultation and consulting with the councils Access Officer and disability groups to inform a list of options agreed with the Executive Member to test, prior to the February decision session dependant on the Executive Members initial comments and steer.

It is recommended by the Councils Community team that all groups in this assessment and seek advice from relevant officers who represent the protected character groups.

However a view could be taken that the consultation, that has had an extensive promotion, may be sufficient, where this consultation received one of the better return rates of many previous council consultations.

Despite this, the financial situation the council is in does significantly inform and an overriding factor that comes down to affordability in the costs to accept cash and replace parking ticket machines that is further unpinned by the 2022/23 budgetary decision.