

Improving People's Lives

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

Item name	Details		
Title of service or policy	Removal of vehicles parked on the public highway or in council car parks		
Name of directorate and service	Directorate of Place / Highways Delivery / Parking Services		
Name and role of officers completing the EqIA	Andrew Dunn, Team Manager - Parking		
Date of assessment	23 May 2025 (Updated October 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 organisations</li> <li>Intended outcomes</li> </ul>	The council operates an internal team of Civil Enforcement Officers (CEO) which has the regulatory powers to carry out the civil enforcement of parking contraventions on the highway by issuing Penalty Charge Notices (PCNs) and approving the removal of vehicles to which a PCN has been issued.  In 2007/08 the council adopted a limited policy for the clamping and removal of illegally parked vehicles that comprised.  Persistent evaders.  Those whose vehicles are parked in defiance of a temporary traffic regulatory order (TRO) imposing restrictions prior to a special event such as the Bath Half Marathon.  Those whose vehicles are parked in defiance of a temporary TRO and obstructing essential road maintenance schemes.  The value of the Penalty Charge is set by the Traffic Management Act 2004 (the 2004 Act) and is reduced by 50% if paid promptly (within 14 or 21 days). Whilst the charge in Scotland and London has risen to £100

and £110 respectively, in England the equivalent charge remains at £50 and has not increased in line with inflation or any other mechanism. This static charge significantly reduces the deterrent effect of the PCN itself as a measure to encourage compliance and evidence indicates some motorists view a PCN as a charge for convenience, which they are only liable to pay if the contravention is observed by an officer and a PCN issued.

The introduction of legislation and the subsequent implementation of the Council's ATTRO, along with the reducing deterrent effect of the Penalty Charge, required the council to review its approach to vehicle removals.

The objective of the review is to ensure that proportionate action can be taken to address vehicles parked in contravention that may additionally represent either:

- (1) a security risk;
- (2) a danger to other road users;
- (3) or prevent the free movement of vehicles including emergency vehicles and public transport can be appropriately managed.

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?

This is a review of an existing policy to update the council's approach to the removal of vehicles parked in contravention of formal restrictions on the highway, or where they impact the safe and efficient movement of vehicles on the network, to ensure full alignment with statutory provisions and updates to the council's Traffic Regulation Orders, including the Anti-Terrorism Traffic Regulation Order (ATTRO).

This review therefore helps the council meet its Highway network management duty. This is the legal requirement for local authorities to ensure the expeditious movement of traffic on their road network by managing the network's operation, performance, and development.

The use of removal powers under the Road Traffic Regulation Act 1986 (the 1986 Act) presents an appropriate and proportionate response where a parking contravention has also occurred.

The council does not have to remove vehicles under this policy and will only do so after assessing the risks associated with each on a case by case basis.

1.3 Do the aims of this policy link to or conflict with any other policies of the Council?

his policy aligns to the core aims of the council's corporate strategy; its three principles; and the following three priorities:

- Clean, safe and vibrant neighbourhoods.
- More travel choices.
- Cultural life

It is also in line with Transport Polices, the Parking Strategy, and is consistent with the prioritisation of active travel and the 'Journey to Net Zero' plan.

https://beta.bathnes.gov.uk/document-and-policy-library/balancing-your-needs-parking-strategy-bnes

https://beta.bathnes.gov.uk/active-travel

https://beta.bathnes.gov.uk/active-travel-schemes-overview

https://beta.bathnes.gov.uk/journey-net-zero/why-do-we-need-journey-net-zero

It supports the delivery of the objectives set out within the Bath City Centre Security Project

### 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?	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.  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?	All people living, working and visiting Bath & Norh East Somerset may be affected by this policy as it directly impacts the movement of vehicles on the network.
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  67% for parking enforcement and appeals processes
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	To date consultation with the Police and relevant Heads of Service and the Director of Place Management, and Cabinet Members have been undertaken regarding the proposals of this EQIA.  Parking restrictions are to be set within the Council's Traffic Regulation Orders and changes to these require a Statutory Notification period of a minimum of 21 days for respondents to consider and provide feedback.

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?

This is a review of an existing policy that has limited application of wider legal powers, and no public consultation is proposed.

Parking restrictions are to be set within the Council's Traffic Regulation Orders and changes to these require a Statutory Notification period of a minimum of 21 days for respondents to consider and provide feedback.

#### 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
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# **3.1 Issues relating to all groups** and protected characteristics

There is a beneficial impact on the public and protected groups through the application of this proposed policy by removing vehicles parked in contravention which may present a security risk, or a hazard to pedestrians and other vehicles.

The council consults annually with local communities and other stakeholders regarding proposals to introduce or vary formal parking restrictions on the highway.

Restrictions are provided across the highways to meet the council's network management duty and ensure that kerb space is available, for those that need it, where is safe to do so. In areas where formal restrictions exist this may include restrictions such as loading bays, Disabled bays, and on and off-street parking areas.

Where permit parking areas or paid for parking areas are provided, the council ensures that eligible motorists may park legitimately to avoid enforcement action via a range of access channels to support people with protected characteristics.

All motorists have a legal right to appeal against PCN that has ben issued to them. In considering an appeal, if the PCN was found to be incorrectly issued any payments made are typically refunded.

Those motorists that parking contravention and have their vehicle removed may be negatively impacted by this review as they will be required to pay statutory fees to ensure the release of their vehicle and may be inconvenienced (financially and in time) by collecting it from the storage facility.

The council provides appropriately located and legitimate parking places to enable motorists to park correctly and in accordance with its Traffic Regulation Orders.

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.

Affected drivers would need to collect their vehicle and pay the statutory vehicle removal fee of £105 as well as the Penalty Charge Notice incurred (£50/£70).

Cost effective alternatives are readily available to ensure motorists can access amenities, including paid for parking, free limited waiting. In Bath, the council provides a 7 days a week park and ride service accessible to all visitors to Bath, operational Mon-Sat 06.30 to 23.30, with reduced hours on Sundays.

3.3 Pregnancy and maternity	Whilst there is no intended impact; it is acknowledged that access to car parking may be
3.3 Pregnancy and	disproportionately impacted by more robust action when their vehicle is inappropriately parked and:  (1) is a security risk; or  (2) is a danger to other road users; or  (3) prevents the free movement of vehicles including emergency vehicles and public transport can be appropriately managed.  This impact has been considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	The council will ensure that vehicles removed to a secure compound remain accessible to motorists for their collection.  Whilst there is no intended impact; 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 and 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) and this group may be disproportionately impacted by more robust action when their vehicle is inappropriately parked and:

- (1) is a security risk; or
- is a danger to other road users; or
- (3) prevents the free movement of vehicles including emergency vehicles and public transport can be appropriately managed.

National exemptions for loading and unloading apply which enable people to stop 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.

This impact has been considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency

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3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	Whilst there is no intended impact; 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 more robust action when their vehicle is inappropriately parked and:  (1) is a security risk; or  (2) is a danger to other road users; or  (3) prevents the free movement of vehicles including emergency vehicles and public
	This impact has been considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.

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

Vehicles displaying Blue badge will be relocated to an appropriate location within a nearby street, rather than be removed for storage.

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

A Blue badge also allows unlimited parking in on street permit parking and paid for parking areas within the council's geographical area restrictions are in place. A Blue Badge allows preferential parking in reserved areas (charges may apply) across all council car parks available for public use.

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

Disabled people, who meet the criteria, can obtain a free Diamond Travelcard which will enable free bus travel on all local bus services, or discounted travel on community travel schemes. <a href="https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard">https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard</a>

Council will follow recommended processes as outlined in Statutory Guidance and ensure vehicles displaying a valid Blue Badge are relocated street to street.

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 people that do not qualify for a Blue Badge may disadvantaged by more robust action when their vehicle is inappropriately parked and:

- (1) is a security risk; or
- (2) is a danger to other road users; or
- prevents the free movement of vehicles including emergency vehicles and public transport can be appropriately managed.

This impact has been considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger

		emergency and public transport vehicles, on our roads.  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.
3.6 Age – identify the impact/potential impact of the policy on different age groups	Community transport schemes operate across Bath and North East Somerset to provide safe, accessible transport for people who cannot use public transport due to disability, age or lack of access to services. More information on these can be found online at <a href="https://livewell.bathnes.gov.uk/community-transport">https://livewell.bathnes.gov.uk/community-transport</a> 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. <a href="https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard">https://beta.bathnes.gov.uk/applying-free-bus-pass-diamond-travelcard</a>	No known impact  Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.
3.7 Race – identify the impact/potential impact on across different ethnic groups		Whilst there is no intended impact. 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

3.9 Marriage and civil	No known impact
- identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.
3.8 Sexual orientation	so may may disadvantaged by more robust action when their vehicle is inappropriately parked and:  (1) is a security risk; or  (2) is a danger to other road users; or  (3) prevents the free movement of vehicles including emergency vehicles and public transport can be appropriately managed.  This impact has been considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  No known impact.

3.11 Socio- economically disadvantaged* –	Drivers may be unable to pay to have vehicle released
identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.
policy/strategy treat married and civil partnered people equally?  3.10 Religion/belief —	Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.

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 requirement, but is a local priority).	Cost effective alternatives are readily available to ensure motorists can access amenities, including paid for parking, free limited waiting. In Bath, the council provides a 7 days a week park and ride service accessible to all visitors to Bath, operational Mon-Sat 06.30 to 23.30, with reduced hours on Sunday.  Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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	Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.	
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	Whilst there is no intended impact, it is noted that members of the armed forces community may be more likely to be mobile and living in areas for short periods, and therefore less familiar with an area. The council has a legal duty to ensure that restrictions on the highway, including those designed to ensure safety and maintain the free movement of vehicles on our roads, are clearly advertised.  Any impact that may be identified should be considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.  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.	
3.14 Care Experienced  ***  This working definition is currently under review and therefore subject to change:	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 significantly impacting the lives of care-experienced young people, exacerbating existing challenges and creating new ones related to	

In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.

mental health, housing, and financial stability. Many may struggle to afford basic necessities and face increased debt so may be disadvantaged by more robust action when their vehicle is inappropriately parked and:

- (1) is a security risk; or
- (2) is a danger to other road users; or
- (3) prevents the free movement of vehicles including emergency vehicles and public transport can be appropriately managed.

This impact has been considered against the impact that parked vehicles within the scope of this review have on the safety of other road users and the movement off vehicles, including larger emergency and public transport vehicles, on our roads.

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<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.

\*\* 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.

\*\*\*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.

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

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
Blue Badge holders may have increased difficulties in recovering their vehicles, and Blue Badge, from a secure compound.	Ensure vehicles displaying a Blue Badge are relocated street to street and the Polce advised of the new location.	N/A	Team Manager – Parking Services	Immediately
No issues identified	Regular review of policy impacts as part of the councils wider Parking Enforcement EQIA	Annual review	Team Manager – Parking Services	Annually or when impacts or changes are identified.

### 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: 29 October 2025