

REPORT OF OVERVIEW AND SCRUTINY BOARD - PARKING ENFORCEMENT TASK AND FINISH GROUP

BACKGROUND

1. In mid-2023, the Overview and Scrutiny Board agreed to establish a task and finish group to review parking enforcement in Havering. This followed a number of issues encountered by Members covering areas such as knowledge and experience of Civil Enforcement Officers (CEOs) consistency in the application of policies and the parking appeals process.
2. The Topic Group consisted of Councillors Gerry O'Sullivan (Chairman) Mandy Anderson, Laurance Garrard, Martin Goode, Keith Prince, Phil Ruck, Matt Stanton and Katharine Tumilty.
3. The Group met regularly between July 2023 and January 2024 and has now concluded its review; identifying findings and recommendations which are detailed in this report.

THE SCOPE OF THE REVIEW

It was agreed that the primary focus for this review would be on the following areas:

- To review the relevant parking enforcement policies and regimes adopted by the Council.
- To make recommendations regarding the Council's parking enforcement policies and regimes going forward with a particular focus on:
 - Improving customer experience
 - Maximising compliance
 - Reducing any confusion
 - Improve communications
 - Digital enabling

METHODOLOGY

The Group met and held discussions with the following colleagues and wishes to place on record its thanks to all these officers for their support with the review. Members would particularly like to record their thanks to the three CEOs who allowed Councillors to accompany them on their rounds and gave invaluable insights into the day to day challenges faced.

Mark Hodgson – Head of Highways, Traffic and Parking
Jo Anne Green – Parking Manager
John Everett – Operations Team Leader
Daniel Onyewuenyi – Senior Civil Enforcement Officer
Craig Wates – Process and Debt Recovery Officer
Civil Enforcement Officers on duty in Elm Park, Harold Hill and Hornchurch.

MEETINGS

The Task and Finish Group met on four occasions conducting the review between July 2023 and January 2024:

31st July 2023 – Initial discussions with parking management officers

7th August 2023 – Observation of CEO pre-shift briefing

27th November 2023 – Discussions with officers of reviews of parking challenges and associated issues

8th January 2024 – Further discussions with parking management officers

Additionally, three Members of the Task and Finish Group met with CEOs in different parts of the borough to observe their work and the challenges they faced.

FINDINGS

1. Training of CEOs

1.1 The task and finish group were very pleased to observe a pre-shift briefing for CEOs but were concerned at the level of facilities available for these staff and felt that these may not be fit for purpose. There were no video screens available for example which could have allowed for discussion of recent parking issues and footage (see recommendation 1).

1.2 Members had concerns that the briefing given was not sufficiently in depth and that daily issues in the borough were rushed through with little time to ensure the understanding of staff. It was felt that handouts or other aids should be given to staff where appropriate (see recommendations 2 and 3).

1.3 It was noted that CEOs often had to refer to either the Civil Enforcement Handbook or the Havering Parking Rules & Regulations document. Both these publications were however very detailed and Members felt that consideration should be given to providing these to CEOs electronically (see recommendation 4).

1.4 During their visits with CEOs on the beat, Members noted

inconsistencies in the approach to certain issues with one example being a lack of a clear procedure around the reporting of faded parking bay markings. Performance issues were a concern in cases such as this and it is suggested that more regular audits of CEO performance could be introduced (see recommendations 5 and 18).

2. Operational Issues

- 2.1 It was explained that the standard policy was to rotate CEOs around different parts of the borough. This was to avoid any potential reprisals should a CEO have suffered abuse etc. when issuing a Penalty Charge Notice and also to allow staff to become familiar with other parts of the borough. Whilst of course appreciating and supporting the importance of the health and safety of staff, the task and finish group nevertheless felt that the consistency of approach resulting from keeping CEOs in the same areas for longer was something that should be considered, where it was safe to do so (see recommendation 6).
- 2.2 CEOs confirmed that there was no direct way for them to communicate with managers while working on street, other than to use their own mobile telephones. Members were concerned at this as it would seem difficult for staff to receive updates of recent incidents etc. during their shift or to summon assistance in emergency situations. Consideration should therefore be given to implementing an electronic communication system for CEOs (see recommendation 7).
- 2.3 During the periods spent in the field with CEOs, it was noted that there were sometimes differences between operating hours etc. shown on main car park signage and on the parking machines themselves. Similarly, it was noted that there were sometimes variations in times and tariffs between on and off street parking areas, even when these were positioned adjacent to each other. It was therefore felt that both these issues could cause confusion and frustration for car park users, as could poor lighting in the areas where parking machines are located. (see recommendations 8 – 10).
- 2.4 The issue of parking machines continued to be something that was regularly reported to Members by residents. It was observed that it was unclear what residents should do if a parking machine was not working and/or they were unable to use the RingGo parking app. It was also important that residents were made more aware of alternative payment facilities that may be available in nearby shops etc. (see recommendations 11 and 12).
- 2.5 A further area of confusion observed was where resident and pay & display parking were located in the same area. Again, the group felt that clearer signage should be available in these areas (see

recommendation 13).

3 Policy Issues

- 3.1 Discussions during the review revealed some uncertainty around how several policies were applied in Havering. These included the use of the discretionary parking policy, the position with motor cycle parking, particularly on yellow lines and whether the free 30 minutes parking concession could be extended to small shopping areas on the outskirts of Romford (see recommendations 14, 16 and 21).
- 3.2 There was a standard amount of time by which people could respond to a PCN at the formal letter stage. Members were concerned however that this could lead, in some circumstances, to appeals being received too late to be considered, especially as appeals at this stage were required to be submitted by post, rather than on line. Whilst elements of the timescales were set by legislation, the group felt that these should be extended where possible (see recommendation 15).
- 3.3 It was accepted that agency workers were employed both as CEOs and to assist with appeal backlogs etc. The task and finish group felt however that, particularly in light of the Council's current financial difficulties, efforts should be made to recruit permanent staff where possible (see recommendation 17).
- 3.4 Members are aware from discussions with residents about the difficulties that can present to car park users when the parking tariffs change from day to night rates. This has caused considerable confusion and misunderstandings among residents and the group therefore feels this area should be reviewed as a matter of urgency. It is suggested that if a resident purchases a parking ticket for several hours just prior to the night time tariff commencing it should run over into the night session (see recommendation 19).
- 3.5 The task and finish group was very grateful for the opportunity to be taken through with officers the reasoning behind parking appeals being accepted or rejected. Members remain unclear however of the process applied when they have supported residents with rejected appeals which were in some cases allowed. The group hence feels that the appeals process should be more transparent with perhaps grounds for appeal being published on the Council's website. Additionally, it is felt it would be highly beneficial if a small cross-party working group of Members could meet with officers regularly to audit, on a random basis, recent parking appeals and the reasons for whether or not they were upheld (see recommendations 20 and 22).

RECOMMENDATIONS

1. That training for CEOs to be delivered in more fit for purpose facilities. The facility should have video screens so that information can be seen by CEOs.
2. That a more in-depth daily briefing be given at the start of shifts so that CEOs are made more fully aware of all current issues.
3. The structure of the briefing needs to be improved. Handouts of useful information should be provided where appropriate.
4. The civil enforcement handbook and Havering Parking Rules & Regulations document are very detailed. They are too large for CEOs to carry with them. It would help if the information was carried electronically.
5. The service should ensure more consistent advice is given to CEOs whether from service management or shift supervisors.
6. Whilst noting potential safety concerns, that consideration be given to keeping CEOs working for a longer period in the same area of the borough.
7. That an electronic system be implemented to ensure quicker communication with staff in the field, both in response to emergency situations and to give updates during their shifts.
8. The service should ensure that car park signage matches the details for operating hours etc. displayed on machines.
9. On and off-street parking should have the same times and tariffs in areas where these are positioned adjacent to each other.
10. If an off-street parking area is adjacent to a council car park both locations should have the same location number. For example, Fentiman Way in Hornchurch has a council car park and an on-street parking area within 2 metres of each other. This will then stop confusion for residents and reduce the amount of appeals that parking receive. Finally, consideration needs to be given to proper lighting where parking machines are located. Older resident sometime struggle to see the signage and meter screen during the winter months.
11. Signage in parking areas to include procedures to inform residents what to do if a parking machine is not working. In particular, signage should inform residents that if a machine is not working and they are unable to use Ringo or pay by phone, they should park at an alternative location.
12. A clear list of shops etc. offering the Paypoint service near to car parking areas should be compiled and made readily available to residents.
13. Clarity of parking signage is required where resident parking and pay & display parking are in the same location.
14. That more detail be provided to residents on how discretionary parking policies are applied in Havering.
15. Given potential postal delays, that more time, if allowed by statute, be given for people to respond at the formal letter stage.

16. That clarity be given on the policy regarding motorcycles being able to park free of charge on yellow lines.
17. Consideration should be given to employing more permanent staff as opposed to agency workers.
18. Regular audits of CEO performance should be implemented.
19. The change over from day to night tariffs is a major cause of frustration for residents. There must be a review of this process.
20. There seem to be inconsistencies in the appeal process. Members would agree that they have all seen several rejected appeals overturned when queried by members. More consistency should therefore be demonstrated in the appeals process.
21. Consideration should be given to giving the free half hour parking concession to small shopping areas on the outskirts of Romford.
22. That a small cross-party working group meet with officers regularly to audit randomised recent parking appeal decisions and the reasons for them.

Finance Implications

There are no direct financial implications as a result of this report. However, prior to the implementation of the task and finish group's recommendations, the service would be required to assess each recommendation's financial implications.

Legal Implications

There are no direct legal implications as a result of this report.

HR Implications

Recommendation 17 regarding the employment of permanent rather than agency staff would need to give due regard to both existing budgets and HR policies prior to implementation.

Recommendations 1-5 and 18 relate to staff training and development and are in line with existing policies in these areas.

Equalities Implications

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- (i) The need to eliminate discrimination, harassment, victimisation and

- any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
 - (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

An EqHIA (Equality and Health Impact Assessment) is usually carried out when a proposed or planned activity is likely to affect staff, service users, or other residents.

The Council seeks to ensure equality, inclusion, and dignity for all in all situations.

There are no other direct equalities implications although more clarity around areas such as the implementation of parking policies would allow for more equal access to parking provision for all residents and visitors.

Health and Wellbeing Implications

The implementation of recommendation 7 regarding better communication with staff operating in the field would allow for improved staff wellbeing, particularly when dealing with emergency situations.

Clearer car park signage would reduce confusion among residents and also assist those who may be visually impaired.

Climate Change Implications

None arising directly from this report.