# EQUALITY IMPACT ASSESSMENT FORM INCLUDING SOCIO-ECONOMIC DUTY

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when competing this document. If you would like further guidance, please contact the Diversity and Inclusion Team on 01443 444529.

An equality impact assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the

- Well-being of Future Generation (Wales) Act 2015.

The <u>'A More Equal Wales – Mapping Duties</u>' guide highlights the alignment of our duties in respect of the above-mentioned legislation.

# **SECTION 1 – PROPOSAL DETAILS**

Lead Officer: Mari Ropstad

Service Director: Sian Nowell

Service Area: Adult Services

Date: 14/05/2025

1.a) What are you assessing for impact?

Strategy/Plan	Service Re- Model/Discontinuation of Service	Policy/Procedure	Practice	Information/Position Statement
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- 1.b) What is the name of the proposal? Revision to Disabled Person's Parking Bay Arrangements.
- 1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.

The existing Disabled Persons Parking Bay scheme was introduced in 2004 and subsequently amended in 2015 following a review. Since its introduction the number of people applying for a parking bay has increased significantly, with 193 received during the last round in 2022/2023.

Historically, 12 parking bays have been awarded each year based on applicants meeting some basic eligibility criteria and a scored functional assessment from an Occupational Therapist/Occupational Therapy Assistant based within the Adaptations and Community Equipment team. Since its introduction, 269 disabled parking bays have been installed in the County Borough. Of these, 115 have been removed, leaving around 154 disabled parking bays in situ.

Rhondda Cynon Taff's process for providing individual Disabled Person's Parking Bays (DPPBs) faces significant challenges. The current scheme levies a £10 non-refundable application fee for all applicants. There is no right of appeal, but applicants can reapply during the next round. Occupational Therapists (OTS) assess and prioritise these applications, often leading to dissatisfaction among those who do not receive an individual disabled parking bay allocation. Additionally, public concerns about the allocation process persist. The process involves not only OT assessments but also coordination with traffic authorities for installation and maintenance. This complexity coupled with a level of public dissatisfaction highlighted the need for a review to explore the potential to refine the assessment and eligibility processes and the wider mechanisms involved the delivery of the parking bay allocation scheme. The current scheme was suspended in September 2023 pending a full external review of the Council's current policy for residential disabled parking bays to inform the options available regarding the future provision of residential disabled parking bays.

The findings of the review by Practice Solutions, dated January 2025, recommended RCT Council continue to offer a scheme for disabled parking bays with revised policy and eligibility criteria to meet the recommendations from the review, including:

- Develop a clear and more transparent process for applicants.
- Introduce more robust criteria and information required to determine eligibility to ensure the best use of limited funds.
- Introduce comprehensive guidance containing the stages of the process, timescales and information about traffic prohibitions for the applicant.
- Introduce a more efficient screening process at the outset.
- Introduce a system to review the use/abuse of disabled parking bays, including removal of bays no longer in use.
- Consider removing the application fee and replacing with a new charging strategy.
- Provide clear written reasons for refusal of a disabled bay to unsuccessful applicants.

As evidenced in the Practice Solutions report, Local Authorities across Wales operate various charging models with most not charging at all, some requiring permits to be paid for annually or an administration fee, and two local authorities charging successful applicants £250 and £689 respectively. The review carried out by Practice Solutions estimated the cost of each parking bay for the last 3 years the scheme was operating to be £1,159 per bay, which includes the legal notices, erection of signs, road markings and traffic management, but excludes the costs incurred from management time, assessments or the application process and as such, based on the cost from each department in the table above, the real cost of each bay is around £3,474.



The proposed new eligibility criteria are:

- Individual must possess a valid permanent Blue Badge.
- Individual must have a car registered at their address and the registered keeper must live there.
- Individual must not have access to off-road parking.
- There are no traffic prohibitions on the road directly outside the main entrance to the property and it would be safe to install a disabled parking bay.
- Individual must supply medical evidence from a Consultant, Specialist Nurse or Physiotherapist specifically addressing their difficulties related to mobility and parking.
- Individual must be in receipt of one of the below benefits:
- Higher Rate Mobility Component of Personal Independence Payment (PIP) or Disability Living Allowance (DLA).
- War Pension Mobility Supplement.
- Attendance Allowance.

The eligibility criteria will need to be evidenced by people uploading or supplying relevant documents and this will be checked early in the process. Similarly, traffic checks will be completed earlier in the process before a full functional assessment is completed for those who meet the criteria and pass the traffic checks.

The functional assessment will be based on scored criteria, which will be reviewed to take account of the new process and amended eligibility criteria. The medical evidence supplied will inform and support the assessment. Any costs associated with gathering this evidence will need to be funded by people and no costs incurred will be reimbursed by the disabled parking bay scheme.

A panel will make the final decision on successful bays with any planning and Traffic Regulation Order requirements to follow. As such it could take up to 2 years from application before a disabled bay is installed.

The decision about charging for the disabled parking bays (refer to Section 8) will impact on whether the bays are installed via a Traffic Regulation Order for anyone with a Blue Badge to use, or as a resident permit parking bay. This in turn will determine how the ongoing management of the bays in terms of use and continuing need can be best organised.

Due to the discretionary nature of the scheme and the difficulties inherent in managing an appeals process alongside a live application scheme it is suggested there be no right of appeal to the panel's decision, however applicants could apply again during the next round.

Option	Cost to applicant	Benefits	Risks
Option 1: No charge	£O	<ul> <li>Affordable to applicants.</li> <li>No need to consider permit bays as opposed to TRO.</li> <li>Problems with non-payment avoided.</li> </ul>	No income generation to support the scheme.
Option 2: A £10 administration charge at the point of application.	£10 for all	<ul> <li>Some income generation to support the scheme.</li> <li>Fee is affordable.</li> <li>Fee has been levied for several years.</li> <li>No need to consider permit bays as opposed to TRO.</li> </ul>	<ul> <li>People may not appreciate paying just to apply.</li> <li>Payments require processing.</li> <li>External review suggested this charge should be reconsidered.</li> </ul>
Option 3: A 10% charge of the cost of bay installation for successful applicants	£115 (currently) if successful	<ul> <li>Some income generation to support the scheme.</li> <li>A percentage charge would move in line with installation costs each year.</li> <li>Mobility benefits received (see eligibility criteria) could reasonably be expected to be used to cover the cost.</li> </ul>	<ul> <li>May be unaffordable for some.</li> <li>Would need to consider resident permit parking bay as opposed to TRO.</li> <li>Payments require processing.</li> </ul>
Option 4 (preferred option): A £10 administration charge at the point of application, plus a 10% charge of the cost of bay installation for successful applicants.	£10 for all + £115 (currently) if successful	<ul> <li>Some income generation to support the scheme.</li> <li>Changing bays to permit bays would make ongoing management easier by requiring reapplication for permit.</li> <li>Admin fee is affordable to all.</li> <li>Admin fee has been levied for several years.</li> </ul>	<ul> <li>A higher fee could act as a deterrent to apply, affecting socio-economic equality.</li> <li>Fee might be unaffordable to some.</li> <li>Might be challenging to establish a rationale for the fee charged.</li> <li>Bays likely need to be permit bays rather than general use disabled bays.</li> <li>People may not appreciate paying twice.</li> <li>Payments will require processing.</li> <li>External review suggested admin charge should be reconsidered.</li> </ul>

Links to documents are provided below: insert here

Include fiia version here

#### Plan to Inform

We will inform people about the changes and consult with them through surveys, drop ins, letters and FAQ.

We will promote the Active Offer to encourage the use of Welsh Language throughout this.

We will produce materials in a range of accessible formats such as Easy Read, large print.

We will tell individuals, carers, families and staff what we intend to do.

#### **Future consultation**

Initiate an 8-week targeted consultation starting on June 16<sup>th</sup> 2025 to seek the views of staff, members of the public and other key stakeholders on the proposed new model, focusing upon asking people:

- what matters to them in respect of the changes, including:
- what they think of our intentions
- what they need us to tell them
- what haven't we thought of
- Following this a further report will be submitted to Cabinet in the autumn of 2025 detailing the outcome of the proposed targeted consultation prior to any final decision being made regarding service changes.

1.d) Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.

There is no statutory duty on Local Authorities to provide a scheme for disabled parking bays and it is a discretionary service. However, external review completed by Practice Solutions suggests that section 149 (4) of the Equality Act 2010 should be considered, in particular "the effect of a lack of parking spaces near [disabled people's] residences and their freedom of movement and travel". As such a DPPB scheme could be considered a public sector duty.

Each bay is installed under the Traffic Regulation Act and therefore has its own traffic regulation order, enforceable by the Council. Currently, anyone with a Blue Badge can utilise the bays.

Wider Legislative and Regulatory requirements that govern our work including specifically for adult services include:

- Social Services and Wellbeing (Wales) Act 2014 sets out our responsibilities as a local authority for improving the wellbeing of people who need care and support, and unpaid carers who need support, and for transforming social services in Wales.
- o Wellbeing of Future Generations (Wales) Act 2015.
- o A Healthier Wales, Our Plan for Health & Social Care, 2020.
- People and Communities priority in the Council's corporate plan to support residents to live independent and fulfilling lives.
- 1.e) Please outline who this proposal affects:
  - Service users
  - Employees
  - o Wider community

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# SECTION 2 - SCREENING TEST - IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?

Screening is used to determine whether the initiative has positive, negative or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required.

Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

# Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

The Public Sector Equality Duty requires the Council to have "due regard" to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

Protected Characteristics	Does the proposal have any positive, negative, or neutral impacts	Provide detail of the impact	What evidence has used to support this	
Age (Specific age groups i.e. young people or older people)	<i>cific age groups i.e.</i> Positive and negative Individuals of all ages, including young individuals and their families, will be influenced by this proposal. However, it is expected to particularly impact on older adults, especially those aged 50 59, due to the rising number of elderly in our population. This increase		WCCIS data indicates that there are 45 individuals with active parking bays, with the o-majority being between 50 an	
		highlights the general effects of aging		
		on mobility and disability, as	Age Group	Total
		mentioned in the adjacent column.	<18	6
			18-29 30-49	2
		riound a unit of the people who	50-59	4
			60-69	10
		responded to the survey Practice	70-79	10
	Solutions undertook gave their age,		80+	2
		with 57% of these being over 55 years		_
		of age. The survey found strong		
		support for bays to continue to be		

offered (80%)	The Dhandda Cyman Tof
offered (80%).	The <u>Rhondda Cynon Taf</u>
	Council's Corporate Plan 2043-
Positive Impacts	2030 suggests that by 2030
As the proposal both clarifies and	there will be a 11.7% increase
accelerates the process, it is likely to	in population of aged 65+
be better understood by individuals	(52,884) of which 6,573 are of
who are considering whether to apply	aged 85+ (21.5% increase) –
and those who submit an application	population projections by Local
	Authority and year 2018-based,
Negative Impact	StatsWales. This historical data
As the application will be managed	suggests a consistent demand
online, there may be people in the	for support services within
older age group with less technical	these age ranges, aligning with
experience and confidence in such a	the projected increase in the
system.	older population by 2030 in
	Rhondda Cynon Taf.
To mitigate this, we will offer people	rthonada Oynon rai.
the opportunity to make their	Review of Disabled Person's
application and produce supporting	Parking Bays, A report for
documents at the One for All Centres	RCTCBC, Practice Solutions
in our communities.	Ltd, January 2025.
On a wider note, there are 9	
	The policy is influenced by
mandatory Equality, Diversity and	The policy is influenced by
Inclusion modules on the Source	Rhondda Cynon Taf Council's
(RCTCBC's staff learning hub) that	Corporate Plan 2043-2030
seek to improve the awareness and	priority of 'People &
cultural competence of our workforce.	Communities'- to safeguard our
This training will raise awareness and	most vulnerable residents of all
enable staff to effectively support	ages providing protection, care
people with protected characteristics,	and support when they need it
not just in relation to age, rather	most so they can maximise
across all groups considered in this	their potential.

Impact Assessment.	
	The CPA rapid review (2016) of diversity in older age identifies the challenges faced by older people particularly with regards to wellbeing and access to positive support.
	The RCT Adult Social Care Strategy (2024-2030) acknowledges that we will experience increased demands relating to older people. This demographic picture includes an increase in people living with complex needs. One of the Council's priorities focuses our effort to facilitate joined-up services for people which will particularly benefit people with complex needs.
	Current data of individuals in receipt of a service in adult services (WCCIS 24/6/24Age Group and Gender for all Individuals in receipt of Care and Support:

		Age Group and Ger	nder for all Care a	nd Support service users
			Female	Male
		18-30	215	318
		31-40	200	230
		41-50	197	202
		51-60	274	266
		61-70	257	266
		71-80	470	345
		81-90	759	392
		91+	366	85
Disability (people with visible and non- visible disabilities or long-term health conditions)	<ul> <li>approximately 10 individuals with a disability who have active parking bays.</li> <li><b>Positive Impact</b> The revised criteria, as follows, clarifies the medical and benefit requirements making it easier for people to gauge their personal circumstances before applying: <ul> <li>Individuals must possess a valid permanent Blue Badge.</li> <li>Individuals must supply medical evidence from a Consultant,</li> </ul></li></ul>	Equality A The Socia Wellbeing sets out o a local au the wellbe need care unpaid ca support, a social ser	T in 2021 s disable act. <u>al Service</u> (Wales) ur respor thority for eing of pe e and sup rers who and for tra vices in V	were d under the <u>s and</u> <u>Act 2014</u> nsibilities as r improving ople who port, and need ansforming Vales.

	<ul> <li>Physiotherapist specifically addressing their difficulties related to mobility and parking.</li> <li>The individual must be in receipt of one of the benefits below: <ul> <li>Higher Rate Mobility Component of Personal Independence Payment (PIP) or Disability Living Allowance (DLA).</li> <li>War Pension Mobility Supplement.</li> <li>Attendance Allowance.</li> </ul> </li> </ul>	that support structures are in place, RCTCBC can promote fair and equitable access to necessary services, supporting the rights and autonomy of those with mental health conditions. In line with <u>Rhondda</u> <u>Cynon Taf Council's Corporate</u> <u>Plan 2043-2030</u> priority of 'People & Communities'
<b>Disability</b> (people with visible and non- visible disabilities or long-term health conditions)	The above seeks to prioritise those with greatest need which feedback raised concerns over when Practice Solutions Ltd sought views on the current approach: <u>Feedback from staff</u>	Review of Disabled Person's Parking Bays, A report for RCTCBC, Practice Solutions Ltd, January 2025.
	Of the staff interviewed as part of this review, most felt that the Council's existing DPPB scheme was extremely challenging, resource intensive and not necessarily targeting those in greatest need.	

	<u>Feedback from telephone Interviews</u> <u>with successful applicants</u> Successful applicants who had been allocated a DPPB over the last 5 years and who were interviewed as part of the review spoke of the enormous difference a bay had made to their lives. Of those who responded to the survey Practice Solutions undertook, 71% said they were disabled.	
<b>Disability</b> (people with visible and non- visible disabilities or long-term health conditions)	Feedback from telephone Interviews	Review of Disabled Person's Parking Bays, A report for RCTCBC, Practice Solutions Ltd, January 2025.

		to implement clear communication strategies regarding the new process. By ensuring that information is accessible and available in multiple formats, individuals and families, including those from diverse backgrounds will be better equipped to understand the process. This inclusive approach can create a supportive environment that informs the wider community and individuals with disabilities about challenges faced and support available.	
<b>Disability</b> (people with visible and non- visible disabilities or long-term health conditions)	Negative	Consultant, Specialist Nurse or Physiotherapist while others could receive it free of charge as part of	

Positive	a specialist nurse attached to them who works with them long term. It would be possible to see a physio privately to obtain this letter. A consultant might be tricky unless they happen to be seeing one at the time. The change aims to ensure that the limited spaces are assigned to the people most in need. These people are more likely to have a close working relationship with their health professionals. The evidence will also compliment the functional assessment and provide additional medical evidence, which we do not currently gather, to evidence the need for a parking bay.	
	The impact of requiring evidence would potentially be that people will require clear communication months before the application window opens to enable as many as possible to gather this evidence. The intention will be for a promotional phase about 3 months before applications open to give people enough time to arrange any appointments, ask their health	

	1		
		professionals and plan ahead	
		financially if costs are incurred.	
	Positive	Those with more significant health	
		conditions will be in a stronger	
		position to apply due to their regular	
		contact with these health	
		professionals, thereby helping to	
		manage demand for spaces and the	
		number of unsuccessful applicants.	
		Costs may be prohibitive for some,	
		however as mobility-related benefits	
		are a requirement to apply, people	
		may use such funds to cover this cost.	
		,	
		Another impact will be the robustness	
		of the assessments and the increased	
		amount of evidence from different	
		sources will strengthen the panel's	
		decision-making on successful bays.	
			Across Rhondda Cynon Taf,
Conder Desseimment	Neutral (Not possible to		according to the ONS (2021b),
Gender Reassignment	determine at this stage)	actions that will affect Gender	0.36% of people aged 16 years
(anybody who's gender			and over have a gender identity
identity or gender		5	different from their sex
expression is different to		· · · · · · · · · · · · · · · · · · ·	registered at birth.
the sex they were assigned		and numbers will potentially increase	
at birth including non-binary			We currently work with a small
identities)			number of trans and non-binary
		0,7	individuals. Exact numbers
			aren't reported due to potential
			of identification. (Source:

	service user data, WCCIS.)
We will ensure that all individuals	
have equitable access to necessary	
services without facing additional	The RCT Adult Social Care
	<u>Strategy (2024-2030)</u> aims
barriers related to their gender	to support people with eligible
identity. Ongoing monitoring of the	needs, achieve what matters to
policy's impact will be essential to	them in their lives this is in
ensure that it remains fair and	addition to ensuring our staff
equitable for all. Although we can't	have appropriate training and
	leadership so that we are able
determine the impact at this moment,	to support people positively,
we will continue to monitor the	and ensure our services and
situation closely and update impact	information are accessible to
assessments when needed.	everyone.

Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Neutral (Not possible to determine at this stage)	Currently, there is no evidence to suggest that this group will be disproportionately affected by the changes to this policy. However, this will be monitored and and if a disproportionate/negative/a diverse impact arises, needs will be addressed, and this Equality Impact Assessment updated accordingly.	
Neutral	Currently, while there is no evidence to suggest that this group will be disproportionately affected by the introduction of new arrangement, we will remain sensitive to the needs of families who may be managing multiple responsibilities, including caring for children or pregnant individuals. We will provide clear communication about the change, ensuring that all families are aware of their options and if a disproportionate/negative/a	
	or neutral impacts Neutral (Not possible to determine at this stage)	or neutral impactsNeutral (Not possible to determine at this stage)Currently, there is no evidence to suggest that this group will be disproportionately affected by the changes to this policy. However, this will be monitored and and if a disproportionate/negative/a diverse impact arises, needs will be addressed, and this Equality Impact Assessment updated accordingly.NeutralCurrently, while there is no evidence to suggest that this group will be disproportionately affected by the introduction of new arrangement, we will remain sensitive to the needs of families who may be managing multiple responsibilities, including caring for children or pregnant individuals.We will provide clear communication about the change, ensuring that all families are aware of their options and

Race		Families from lower socio-economic	In 2021, a total of 96.7	% of
	Neutral	backgrounds may struggle to adjust to	RCT residents were wh	ite
(ethnic and racial groups i.e.			according to the RCT D	
minority ethnic groups,		disproportionately affect racial	Library.	
Gypsy, Roma and Travellers)		minorities who are statistically more		
		5	As of May 20, 2025, RC	די
			WCCIS data indicates t	
		There may be also disparities in		
		s	majority of those with a	
		process among different racial and	parking bays are White	
		socio-economic groups including:	Ethnicity	Total
		Unequal access to education	Any White Background, including Welsh, E	8
		and resources	Chinese Information not obtained	6
		<ul> <li>Systemic inequalities and</li> </ul>	Not stated (inactive)	1
		biases in information	White British	29
		dissemination		
		Historical discrimination leading	Data from the WCCIS of	latabase
		to distrust in systems	demonstrates that indiv	
		<b>a a</b>	receipt of a service and	
		differences	are predominantly white	
			(80.9%) there are 8.13	
		The barriers for this group include	as white other and 1.02	
		systemic discrimination, language	reporting a wide variety	
		differences, and lack of	ethnic backgrounds. 9.9	95%
		representation. These can be	have no ethnic backgro	und
		mitigated by implementing supportive	reported.	
		measures/policies that promote		
		inclusiveness, providing language	Families from lower soo	cio-
		support services, and ensuring	economic backgrounds	-
		diverse representation in decision-	face intensified challen	
		making.	to various intersecting f	
		maning.	5	
			as highlighted in the We	
		The Council can work towards	Government's 2021 rep	•
		ensuring that all individuals have	"Implementing the Soci	<u>0-</u>

equitable access to necessary services, regardless of their racial or ethnic background.economic Duty: A review of evidence on socio-economic disadvantage and inequalities of outcome." It showed racial minorities are more susceptible to financial difficulties, which restrict their access to essential work towards ensuring that all
ethnic background. By proactively addressing the identified concerns and implementing supportive measures, the Council can work towards ensuring that all by proactively addressing the identified concerns and implementing supportive measures, the Council can resources. Data from the RCT
of outcome."It showed racialBy proactively addressing the identified concerns and implementing supportive measures, the Council can work towards ensuring that allof outcome."It showed racial minorities are more susceptible to financial difficulties, which restrict their access to essential resources. Data from the RCT
By proactively addressing the minorities are more susceptible identified concerns and implementing to financial difficulties, which supportive measures, the Council can restrict their access to essential work towards ensuring that all resources. Data from the RCT
identified concerns and implementing to financial difficulties, which supportive measures, the Council can restrict their access to essential work towards ensuring that all resources. Data from the RCT
supportive measures, the Council can restrict their access to essential work towards ensuring that all resources. Data from the RCT
work towards ensuring that all resources. Data from the RCT
5
individuals have equitable access to Data Library shows that the
necessary services, regardless of their average ranking for access to
racial or ethnic background. services on the WMID for all
RCT is 1,105 out of 1,909,
Impact upon specific groups will be suggesting limited resources
monitored and if a and exacerbating their
disproportionate/negative/ diverse struggles. Overlapping social
impact arises, needs will be categories such as race and
addressed, and this Equality Impact class create interconnected
Assessment updated accordingly. systems of disadvantage,
impacting access to services
As referred to in the Age section and involvement in public life.
above, 9 mandatory Equality, Diversity
and Inclusion modules seek to The Well-being of Wales 2023:
improve the awareness and cultural Ethnicity and Well-being report
competence of our workforce. This has found people from ethnic
training will enable staff to effectively minority backgrounds face
support people with protected many disparities including
characteristic. access to resources.
Notably, the ADSS report
(2023) "Delivering Social Care
in an Anti-Racist Wales"
presents recommendations that
must be addressed. Our RCT

			Adult Social Care Strat 2024-2030 addresses priorities in their servic This is especially impo effectively managing th communication needs individuals from ethnic minorities, drawing on insights from those wit experience.	these e plans. ortant for ne of the
<b>Religion or Belief</b> (people with different religions and philosophical beliefs including people with no beliefs)	Neutral (Not possible to determine at this stage)	There is no evidence to suggest that this group will be disproportionately affected by the introduction of this change. However, if a disproportionate/negative/ diverse impact arises, this will be addressed, and this Equality Impact Assessment updated accordingly.		
<b>Sex</b> (women and men, girls and boys)	Neutral (Not possible to determine at this stage)	66% of people who responded to the survey Practice Solutions undertook Were female, 32 % male, 3% preferred not to say. The survey found strong support for bays to continue to be offered (80%). WCCIS data shows there are more males than females with active parking bays in RCT.	The proportion of fema males within RCT appo- be equal in 2021, as the Data Library recorded 51.1% of residents we females and 48.9% of were male. WCCIS Data on Active Bays (May 2025):	eared to he RCT that there re residents
		Currently, there is no evidence to suggest that this group will be disproportionately affected by the introduction of this change.	Gender Female Male Sex by Age Group (RC % of the population of	

However, if a disproportionate /	people that completed the
negative / diverse impact arises,	census 2021
needs will be addressed, and this	Male: Aged under 15 19.2%
Equality Impact Assessment updated	- Aged 16 to 24 years
accordingly	11.5%
	- Aged 25 to 34 years
	12.9.0%
	- Aged 35 to 49 years
	18.2%
	- Aged 50 to 64 years
	20.3%
	<ul> <li>Aged 65 years above</li> </ul>
	18.5%
	Female:
	Aged under 15 17.7%
	Aged 16 to 24 years 10.1%
	Aged 25 to 34 years 13.1%
	Aged 35 to 49 years 18.4%
	Aged 50 to 64 years 20.1%
	Aged 65 years above 20.7%
	Review of Disabled Person's
	Parking Bays, A report for
	RCTCBC, Practice Solutions
	Ltd, January 2025.

Sexual Orientation (bisexual, gay, lesbian, straight)	Neutral (Not possible to determine at this stage)	Currently, there is no evidence to suggest that the introduction of this change will disproportionately affect any specific group, including those identifying as bisexual, gay, lesbian, straight, or LGBQ+. We are committed to ensuring that all individuals, regardless of their sexual orientation, have equitable access to necessary services without encountering additional barriers. It is	According to the RCT Data Library, in 2021 the percentage proportion of residents that identified as Straight/Heterosexual, Gay/Lesbian/Bisexual/Other sexual orientation within RCT compared to Wales did not differ, with 1.5%.
		our responsibility to create an inclusive environment where everyone feels supported and valued. Ongoing monitoring of the impact of this policy will be crucial to ensure it remains fair and equitable for all individuals. If we identify any disproportionate or negative impacts on our LGBQ+ individuals in receipt of a service or any other group, we will take immediate action to address these needs. The Equality Impact Assessment will be updated	
		accordingly to reflect any necessary changes, ensuring that the proposed change does not unintentionally disadvantage individuals based on their sexual orientation.	

In addition, due to Council commitments made to the following groups of people we would like to consider impacts on them:

	Does the proposal have any positive, negative, or neutral impacts	Provide details of the impact	What evidence has been used to support this view?
Armed Forces Community (anyone who is serving, has served, family members and the bereaved)	Neutral	The proposal is not anticipated to impact disproportionally on this group of people. It includes War Pension Mobility Supplement in its criteria. For those in the armed forces community who may be adjusting to civilian life including accessing and paying for services, RCTBC has a dedicated Armed Forces Covenant Liaison Officer / Veteran Officer to provide support and advice to this group of people.	According to the RCT Data library, in 2021 only 4.1% of RCT residents are serving/have served in the UK Armed forces. This is slightly proportionately less than the percentage of those across Wales that are currently/have served (4.5% of residents). Armed Forces Covenant: annual report 2022 to 2023 – one of the recommendations of this document is to ensure Veterans mental health treatment in Wales is meeting current need The Armed Forces Act 2021 places a legal duty on specified public bodies to have due regard to the principles of the Armed Forces Covenant when exercising certain statutory functions in the fields of

			healthcare, education and housing.
Carers (anyone of any age who provides unpaid care)	Positive	<ul> <li>Only 3 individuals with Active Parking Bays are carers.</li> <li>The proposal aims to provide a streamlined process with greater clarity and speed.</li> <li>The simplified process may reduce anxieties around applications therefore some carers may be relieved and reassured by this, particularly if they are already facing stressors due to caregiving responsibilities.</li> <li>Figures in the table show that: a higher percentage of carers in the area are female.</li> <li>a high proportion sit within the older age group of 51 yrs +</li> <li>Over a quarter of unpaid carers (UK), identify as having a disability, which is higher than the non-carer population, furthermore almost a third of</li> </ul>	According to the RCT Data Library, 11.1% of the population of RCT provide between 9 – 50+ hours of unpaid care a week. As of May 20, 2025, RCT WCCIS data indicates that 42 individuals with active parking bays are not carers, while 3 individuals are. RCT WCCIS Data (June 2024) - Age Group and Gender for carers with Carers Support Plan:

	carers in Wales identify as having a disability.		Female	Male
	Therefore, the cumulative	18-30	2	2
	effect will be monitored and	41-50	6	3
	this Impact Assessment updated accordingly.	51-60	13	8
		61-70	17	7
		71-80	24	14
		81-90	11	9
		91+		1
		Total	73	44
		State of Carers UK 2 consider the Census Day carers in V (29.8%) that	27% of unp emselves o y 2021 m Vales wer	baid carers disabled. ore unpaid e disabled

If the initial screening test has identified negative impacts, then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant, please provide an adequate explanation below:

Are you happy you have sufficient evidence to justify your decision?

Yes x No	
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Name: Mari Ropstad

Position: Head of Service

Date: 07/05/25

Please forward a copy of this completed screening form to the Diversity and Inclusion Team.

PLEASE NOTE – there is a separate impact assessment for Welsh Language. This must also be completed for proposals.

Section 3 Socio-economic Duty needs only to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. Definition of a 'strategic nature' is available on page 6 of the <u>Preparing for the Commencement of the Socio-economic Duty</u> Welsh Government Guidance.

# SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

<ul> <li>Single parents and vulnerable families</li> <li>Pensioners</li> <li>Looked after children.</li> <li>Homeless people</li> <li>Students</li> <li>Single adult households</li> </ul>	<ul> <li>People living in the most deprived areas in Wales.</li> <li>People with low literacy and numeracy</li> <li>People who have experienced the asylum system.</li> <li>People misusing substances.</li> <li>People of all ages leaving a care setting</li> <li>People involved in the criminal justice system</li> </ul>
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Socio-economic disadvantage	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Low Income/Income Poverty (cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)	Positive	Positive Under Option 1, the removal the £10 administration fee will benefit all including those already facing challenges in the cost of living crisis. Negative Families from lower socio-economic backgrounds may struggle to fund the increased cost of a successful application under options 3 and 4 which seek the administration charge of £10 plus a further 10% of the cost o the bay, currently 10% = £115)	Between 2019/20 and 2021/22, the average poverty rates in England (22%), Wales (22%) and Scotland (21%) had converged to around the same level, - <u>UK Poverty 2024:</u> <u>The essential guide to</u> <u>understanding poverty in the UK  </u> <u>Joseph Rowntree Foundation</u> ( <u>irf.org.uk</u> ) Within RCT specifically, in 2023, the county borough had a destitution rank of 3/5 (1 being the lowest, 5 being the highest) according to <u>The geography of</u> <u>destitution 2023   Joseph</u> <u>Rowntree Foundation (jrf.org.uk).</u>
		This could disproportionately affect disabled people and those from racial minority groups who are statistically more likely to experience financial hardship. To mitigate this, providing clear	Poverty Taking a Heavy Toll on NHS Services   The King's Fund (kingsfund.org.uk) https://www.equalityhumanrights.c om/sites/default/files/2023/Is%20W ales%20Fairer%20Equality%20an
		information can help families understand the charges at the outset.	d%20Human%20Rights%20Monit or-%20English- %20accessible%20PDF.pdf

		Regular monitoring of the uptake and drop off to help ensure equitable access to services.	
Low and / or No Wealth (enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)	Negative	Negative Impacts: The new process may discourage individuals and families to consider applying for a Disabled Person's Parking Bay if the charge to successful applicants is introduced. This may disproportionately affect disabled people and those from racial minority groups who are statistically more likely to experience financial hardship. Mitigations: Regular monitoring of uptake and drop out can help ensure equitable access to services.	https://www.equalityhumanrights.c om/sites/default/files/2023/Is%20W ales%20Fairer%20Equality%20an d%20Human%20Rights%20Monit or-%20English- %20accessible%20PDF.pdf

Material Deprivation (unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)	Neutral	The RCT Data Library notes that RCT has an average overall Welsh Index of Multiple Deprivation (WIMD) ranking of 743/1909 (1 being the most deprived and 1909 being the least deprived). The average ranking for access to services specifically for all of RCT is 1105/1909.
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Socio-economic disadvantage	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
Area Deprivation (where you live (rural areas), where you work (accessibility of public transport)	Positive	Individuals and caregivers residing in deprived areas may be disproportionately impacted by the revised arrangement either positively with the removal of the £10 administration charge under Option 1 or	Library notes that RCT has an average overall Welsh Index of Multiple Deprivation (WIMD) ranking of 743/1909 (1 being
	Negative	negatively should this charge remain and a further charge for 10% / currently £115 be sought for successful applications under Options 3 and 4. Lack of reliable Wi-Fi and/or broadband	Furthermore, the average
	Negative	for the new digital process may impede timely and hassle-free application causing frustration or anxiety for the person. People who are not tech savvy may have reservations and / anxiety around trusting certain ways of applying for a Disabled Person's Parking Bay. Travelling to One for All Centres for support may be costly, unsuitable and off putting	shows the location of the 45 individuals with parking bays across Rhondda Cynon Taf:
		To mitigate such impacts, we will monitor complaints and update Impact Assessments accordingly.	Pant Yr-Awel Heol-Y-Cyw Beynnau Gwynion

		1		1
			Location	Total
			Abercynon	1
			Aberdare	2
			Beddau	1
			Brynna	1
			Cilfynydd	2
			Cwm Clydach	3
			Ferndale	4
			Gilfach Goch	2
			Maerdy	1
			Mountain Ash	2
			Penrhiwceiber	2
			Pentre	3
			Pontypridd	1
			Porth	2
			Taffs Well	1
			Tonypandy	3
			Trallwng	2
			Trealaw	5
			Treherbert	1
			Treorchy	2
			Tylorstown	2
			Ystrad	2
Socio-economic background (social class i.e. parents' education, employment and income)	Negative	• •	Library, in 2021 10% of tresidents aged 16 and RCT have never work ong-term unemployed. Dercent higher than the across Wales of 9%. In n 2021 RCT has a	the usual d over in ked/ are This is 1 average addition, a higher

Socio-economic	Negative	<ul> <li>be incurred should applications be without qualifications 24.2%, made online via a variable tariff for data.compared to 19.9% across Wales (RCT Data Library).</li> <li>People who are not tech savvy may feet the on-line way of applying is beyond their capabilities or have anxieties around learning to use the new system.</li> <li>To mitigate this, complaints and representations should be collated and monitored to identify negative trends and remedy these.</li> <li>Disabled, older people including carers According to the RCT Data and notably female carers may face a Library, in 2021 43.5% of RCT cumulative negative impact of the residents were economically</li> </ul>
disadvantage (What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)		changes due to financial implications, inactive, which was the same broadband / Wi-Fi access to online proportion as across Wales. applications, taking time away from 7.6% of this total were caring responsibilities to go to the One economically inactive due to for All Centre if applying in person. To mitigate this, complaints and students. Notably, 23.2% of representations should be collated and those were retired, which is monitored, recognising protected expected to increase with the characteristics in keeping with trajectory of an ageing mandatory EDI training, in order to demographic. identify negative trends and remedy these.

# SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified. Attach a separate action plan where impacts are substantial.

The Council aims to minimise any negative impacts of the proposed changes on individuals by regularly monitoring barriers faced by people impacted by this change to address the challenges they face including those with:

- less technical experience and confidence in such a system.
- Financial and / or practical considerations including caring responsibilities, deterring access to One for All Centres,
- Protected characteristics statistically linked to specific challenges such as financial hardship experienced by ethnic minority groups and disabled people.

To address the potential disproportionate, negative, or adverse impacts that the proposal may have on individuals with disabilities, the following steps will be taken to reduce or mitigate these impacts:

Training for Staff: The Council currently Provide training for staff involved to recognize the unique needs of individuals with disabilities. This training will be beneficial when offering appropriate support during the process.

Maintain Existing Disabled Person's Parking Bays. Ensure that existing bay holders are reassured they will keep their current bay on the basis of their historic application and current needs.

Inclusive Communication: Ensure that all communications regarding the charges are clear, accessible, and provided in multiple formats includes using plain language to accommodate individuals with varying disabilities.

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.
- 4.c) Give sufficient detail of data or research that has led to your reasoning, in particular, the sources used for establishing the demographics of service users/staff:
  - RCT WCCIS Data (May 2025) offers a detailed overview of the characteristics of individuals with parking bays in RCT, covering aspects such as:
    - Age
    - Gender
    - Disability
    - Language
    - Ethnicity
    - Caring responsibilities
    - Location

This data gives us a comprehensive snapshot of the community we serve, enabling us to customise our services to effectively address the diverse needs of individuals.

- The recommendations aim to ensure the key findings from the external review are implemented whilst taking account of the limited human and financial resources available to the Council in operating this scheme.
- As evidenced in the Practice Solutions report, Local Authorities across Wales operate various charging models with most not charging at all, some requiring permits to be paid for annually or an administration fee, and two local authorities charging successful applicants £250 and £689 respectively. The review carried out by Practice Solutions estimated the cost of each parking bay for the last 3 years the scheme was operating to be £1,159 per bay, which includes the legal notices, erection of signs, road markings and traffic management, but excludes the costs incurred from management time, assessments or the application process and as such, based on the cost from each department in the table above, the real cost of each bay is around £3,474.Section 149 (4) of the Equality Act 2010 has been considered, in particular "the effect of a lack of parking spaces near [disabled people's] residences and their freedom of movement and travel". As such a DPPB scheme could be considered a public sector duty. Each bay is installed under the Traffic Regulation Act and therefore has its own traffic

regulation order, enforceable by the Council.

- Administrative Efficiency and Resource Allocation: The proposal seeks to streamline the administrative process and OT assessments to protect resources and has 4 options, 3 of which retaining the £10 administration charge and 2 of which seeking at 10% contribution (= £115 at present) for successful applications to contribute towards the cost of the bay.
- 4.d) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.

An independent consultation facilitated by Practice Solutions has taken place in the Autumn / winter 2025. This took the form of discussions with Staff, Disability Forum and Carer's Project and telephone interviews with successful and unsuccessful applicants. Key extracts directly from the report are as follows:

### Feedback from staff

Of the staff interviewed as part of this review, most felt that the Council's existing DPPB scheme was extremely challenging, resource intensive and not necessarily targeting those in greatest need.

### Feedback from meetings with the Disability Forum and Carers Project

As part of the review, people who attend the Disability Forum (Cynon) and the Carer's Project were asked to provide feedback. Unfortunately, neither group was well attended during the review and so discussion was limited, although further opportunities for views to be expressed were provided through the survey.

### Feedback from telephone Interviews with successful applicants

Successful applicants who had been allocated a DPPB over the last 5 years and who were interviewed as part of the review spoke of the enormous difference a bay had made to their lives.

### Feedback from telephone Interviews with unsuccessful applicants

While most said that they had found the OT staff very helpful, they all felt extremely frustrated about the lack of explanation/reason for their application not being granted. Some said they had never received a letter telling them the outcome of their application and most felt that the process was unfair and that the eligibility criteria should be made clearer.

A survey was also conducted as part of the review received 314 responses of the people who responded:

- 66% were female, 32% male, 3% preferred not to say
- 71% were disabled
- Of the third who gave their age, 57% were over 57 years of age
- 53% had caring responsibilities
- 34 were residents who had been allocated a DPPB.
- 48 were a relative, friend, partner or advocate of someone with a DPPB.
- 62 were residents who had been unsuccessful in their application.
- The 218 remaining respondents identified as Members of the Public, Staff or Other.

Views were sought by Practice Solutions to inform the review on:

- Eligibility criteria
- Application process
- Use of spaces for bay holders
- Future of Disabled Person's Parking Bays, notably 90% agreed the Council should continue to offer these
- 4.e) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?

Yes 🔀 No 🗌

### **SECTION 5 – MONITORING AND REVIEW**

- 5a) Please outline below how the implementation of the proposal will be monitored:
  - Regular comparison of the number of applications received under the new process compared to the previous one.
  - Feedback collection from individuals, families, care managers and One for All staff regarding their experience with the process and the associated charge.
  - Monitoring split of digital versus in person applications
  - Collating complaints and representation
- 5b) When is the evaluation of the proposal due to be reviewed?

This will likely be reviewed within 24 months after its implementation. This timeline allows for a sufficient data collection period to assess the effectiveness and impact of the charge(s).

5c) Who is responsible for the monitoring and review of the proposal?

The responsibility for the monitoring and review of the proposal lies with the Adult Services management team, in collaboration with Highways and One for All staff. Designated officers will be assigned to oversee the tracking of requests and the financial and wider resource implications of the proposal.

5d) How will the results of the monitoring be used to develop future proposals?

The results of the monitoring will be used to inform the development of future proposals by identifying trends in demand, assessing the delivery of the service, and gathering insights from stakeholder feedback. This information will guide potential adjustments to the process, and any additional support that may be needed for individuals.

#### **SECTION 6 – REVIEW**

As part of the Impact Assessment process all proposals that fall within the definition of 'Key Decisions' must be submitted to the Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your proposal is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Decision, please forward your impact assessment to Councilbusiness@rctcbc.gov.uk for a Review Panel to be organised to discuss your proposal. The EqIA guidance document provides more information on what a Key Decision is.

It is important to keep a record of this process so that you can demonstrate how you have considered equality and socio-economic outcomes. Please ensure you update the relevant sections below.

Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
Consultation Comments	Date Considered	Brief description of any amendments made following consultation

# **SECTION 6 – SUMMARY OF IMPACTS FOR THE PROPOSAL**

Provide below a summary of the impact assessment. This summary should be included in the equality and socio-economic impact section of the Cabinet report template. The impact assessment should be published alongside the report.

### **SECTION 7 – AUTHORISATIONS**

Lead Officer:

Name: Mari Ropstad

Position: Head of Service

Date: 14/05/25

I recommend that the proposal:

- Is implemented with no amendments.
- Is implemented taking into account the mitigating actions outlined.
- Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage.

Head of Service/Director Approval:

Name: Sian Nowell

Position: Head of Adult Services

Date: 14/05/25

Please submit this impact assessment with any SLT/Cabinet Reports.