Equality Impact Assessment (EQIA): Charge Parking

Section 1: Details of the policy/practice/project

| **Information required** | **Enter information below** |
| --- | --- |
| Department/Team responsible | Visitor Services and Communities |
| Name of Policy, Practice or Project being assessed | Charge Parking Management |
| Purpose and anticipated outcomes | To inform current and future charge parking strategy and process |
| Is this a new or existing Policy, Practice or Project? | Existing and new |
| List of participants in Equality Impact Assessment process | 137 people/organisations responded to the September 2020 survey – **Appendix 1**. Data was collected from additional emails and visitor comment cards over several years but the exact number of individuals who responded re charge parking specifically is unknown. Specific organisations to whom the September 2020 survey was sent were:  Age Scotland  Life Care  Alzheimer Scotland  Shelter Scotland  Mind  The Butterfly Trust  MS Scotland  Disability Scotland  Trussell Trust  Save the Children  Happy n Healthy  Rutherglen High  Sense Scotland  Baltic Street Adventure Playground  Wellhouse Housing Association Easterhouse  Act Argyll  Nevis Landscape Partnership  Access Officer Argyll & Bute  Access Officer Highland  Ramblers Scotland  Euan's Guide  Developing Mountain Biking in Scotland  The survey may have been shared to other organisations or on social media platforms. |
| Date Assessment started | September 2020 – Original EQIA completion |
| Completion date | Reviewed in June 2023 |
| Who is likely to be affected?  *E.g. employees, visitors, contractors, women, men, young people, older people, people with disabilities etc.* | Employees, visitors, contractors, women, men, older people, people with disabilities. |

Section 2: Collecting information

What evidence is available about the needs of relevant groups? Please consider demographic data, including census information, research, consultation and survey reports, feedback and complaints, case law, others knowledge and experience. Please refer to the list of evidence on the EqIA page of the intranet.

| **Details** | **Source of evidence** |
| --- | --- |
| The first All Forests Survey (AFS1) measured the volume and profile of visitors to  Scotland’s National Forest Estate between 2004 and 2007, providing baseline data. The second survey (AFS2) was commissioned in to update these measures in 2013.  The AFS2 estimated 9.1 million visits per annum to Scotland National Forest Estate, up from 8.7 million from the AFS1.  • Average age of visitors was 46, 56% were over the age of 45, with 27% age 60+ (2.5 million visitors)  • 6% of visitors had a disability, a lower proportion than in the Scottish population as a whole (19%)  • 2% lived in areas within the bottom 10% of the Scottish Index of Multiple Deprivation. The Scottish average is 10%  • 85% of visits were taken by car  Since the last national survey, AFS2 in 2013, a number of regional surveys have been commissioned and undertaken by external market research companies giving more up-to-date information on visitors to these areas. | All Forests Survey 2, 2013 |
| Tweed Valley Forest Park Research, 2016  • Average age of visitors was 44, 41% were over the age of 45, with 18% age 60+  • 61% were in the higher socio-economic groups (SEGs) ABC1, higher than the national average (50%)  • 38% were in the lower C2DE SEGs, lower than the national average (46%)  • 90% of visits were by car | Tweed Valley Forest Park Research, 2016 |
| Galloway Forest Park Research, 2018  • 68% of visitors were over the age of 45, 23% were 60+  • 69% were in the higher ABC1 SEGs, higher than the national average (50%)  • 26% were in the lower C2DE SEGs, lower than the national average (46%)  • 89% of visits were by car | Galloway Forest Park Research, 2018 |
| Queen Elizabeth Forest Park Research, 2019  • 49% of visitors were over the age of 45, 17% were 60+  • 57% were in the higher ABC1 SEGs, higher than the national average (50%)  • 39% were in the lower C2DE SEGs, lower than the national average (46%)  • 6% of visitors had a disability, a lower proportion than in the Scottish population as a whole (19%) | Queen Elizabeth Forest Park Research, 2019 |
| EqIA survey of targeted groups identified as most likely to be impacted by charge parking plus some general population surveying – focused on payment method. | Charge Parking payment methods survey monkey Sept 2020 EqIA results and analysis by FLS Visitor Marketing and Insights Manager – **Appendix 2**. |
| Site reviews by grading and assessment organisations. | Online reviews on Euan’s Guide and via VisitScotland assessors and TripAdvisor. |
| Further specific feedback from disability charity Euan’s Guide was sought to ensure the views of disabled people were included in this assessment. | Paul Ralph, Access and Inclusion Director, Euan's Guide representing the Euan’s Guide audience of over 40K online visitors each month, network of reviewers and Ambassadors. Paul Ralph gave feedback in 2020 and 2022 when more details of the different payment methods offered by pay by phone suppliers were provided for comment. |
| FLS parking visitor feedback from visitor emails, visitor feedback cards and FLS VS regional and national staff has been included in this assessment. | Emails to FLS, comments on social media sites, feedback cards at visitor sites (404 in 2018), parking specific emails sent to the Visitor Commercial Manager for response, verbal visitor comments relayed by regional staff. |
| Feedback from parking industry, tourism industry with charging car parks and charge parking suppliers | Discussions with British Parking Association staff (FLS is a member). BPA code of conduct requires FLS to have a system in place to monitor that visitors aren’t parking in disabled parking spaces without a Blue Badge and follow this up if they are - <https://www.britishparking.co.uk/BPA-Code-of-Professional-Conduct>. It also requires us to have parking terms and conditions at an appropriate height near the disabled parking bays. Discussions with existing suppliers regarding their products and customers, discussions with other tourism organisations with charge parking. |
| Statistics regarding contactless card ownership in UK | <https://www.statista.com/> |

| **From your research above, if you have you identified any gaps in evidence, enter the details of the gaps below** |
| --- |
| We were unable to identify/gain specific feedback from groups representing older visitors and those on low incomes although both these groups have been sent the survey and emails (we suspect the lack of a specific response was due to working from home/covid backlog). We have however received some individual comments regarding older and low income visitors in our survey as well as emails and verbal feedback to Rangers. These groups have been considered in the assessment and initiatives implemented based on these considerations. This EqIA will be updated as new information and feedback is received. |

| **As appropriate, please describe below, the consultation/engagement undertaken, including details of the groups involved and the methods used** |
| --- |
| Targeted survey monkey sent by email - **Appendix 1**  Regular discussions with FLS regional staff and tourism and parking industry partners  Survey link shared on mountain biking Facebook page at FLS highest footfall site – Glentress.  Follow up emails with Word version of survey questions to specific organisations representing disabled people, older people and people experiencing poverty.  Ongoing discussions with visitors as part of the standard FLS Enquiries and Complaints processes. Frontline discussions with FLS Rangers fed back via the yearly Ranger surveys and verbally to the Visitor Commercial Manager. |

| **Detail below if there are any other groups to be consulted** |
| --- |
| As above, organisations specifically targeted representing older people and people experiencing poverty have not responded directly – perhaps due to current Covid-19 restrictions at the time. This will be followed up in 2023/24 and the EqIA will be updated as new responses are received. |

Section 3: Impacts

Has the research and consultation identified any potential for impacts on those with the following protected characteristics:

| **Protected Characteristic** | **Potential Impact (yes or no)** | **Explain** |
| --- | --- | --- |
| **Age**  *E.g. older people, children including looked after children, young people including care leavers* | Yes | Feedback from some older visitors is that they would find payment by phone only more difficult or impossible to pay if that were the only payment method at a site. On this basis, we would ensure there was another method of payment in addition to payment via a phone such as via a home computer, phone call to a call centre from a landline, annual parking pass, payment via a parking meter (where possible), payment via a visitor centre (where possible) or if all these methods were not possible advise exemption from payment. |
| **Disability**  *E.g. long term mental health conditions, neurodiversity, physical impairments* | Yes | Paul Ralph of Euan’s Guide has advised that many disabled people face barriers in using the telephone. Many disabled people use technology to access the internet but this is often something that is not portable. Equally, the Office of National Statistics estimated that 27% of disabled people have no access to the internet. Given the challenges of Coronavirus the use of contactless payment has now become the norm. Disabled people, in general prefer contactless payment as there’s no trying to see pin numbers or have the dexterity to press buttons, and so many other reasons. The uptake of the use of Apple Pay and B-Pay (now rebranded) is also something welcomed by disabled people as the devices are more accessible and easy to use. This would be, by far, the preferred method of purchasing parking tickets. With the provision that the contactless point is accessible e.g. not too high for wheelchair users, well-marked with large print and high visibility location indicators, and that any pole or stand is not placed on a raised plinth with an inaccessible kerb so wheelchairs can get close enough to use the machine  On the basis of this feedback, we will ensure there is another method of payment (as listed in above) in addition to pay by phone or advise where exemption from payment. All our charge parking sites are designed with wheelchair access to payment meters in mind with tariff cards and signs in accessible font and high positioned blue pay parking flags. Our main car parks with extra facilities and fully accessible trails all have marked disabled bays. We continually research viable ways of improving signal at our sites to allow card and phone methods to be used and allow 72 hours after a visit to pay in the comfort of a home environment by home device or landline.  At Tentsmuir in Fife, we have a coin-operated barrier system. Regular Blue Badge Tentsmuir visitors can apply for a free barrier swipe pass to allow free access to this site. Infrequent or adhoc Blue Badge visitors can contact the East Region to provide their Blue Badge details to receive a refund. FLS is currently looking at new technology options to replace this type of barrier system with a modern ANPR system such as the system installed at Glentress in 2023. This system allows regular Glentress Blue Badge holders to apply to have their vehicle registration entered into the ANPR system to allow free exit each time. Infrequent or adhoc Blue Badge visitors can enter their registration and Blue Badge serial number into one of the onsite pay stations to allow free exit. Further assistance can be provided by our Regional enquiries teams or onsite Café tenants at Glentress. |
| **Gender reassignment**  *Where a person is living as a different gender to that at birth* | No |  |
| **Pregnancy and maternity**  *Including breastfeeding* | No |  |
| **Race, ethnicity, colour, nationality or national origins**  *Including gypsies or travellers, refugees or asylum seekers* | No |  |
| **Race, ethnicity, colour, nationality or national origins**  *Including gypsies or travellers, refugees or asylum seekers* | No |  |
| **Religion or belief**  *Including non-belief* | No |  |
| **Sex/Gender** | No |  |
| **Marriage and civil partnership** | No |  |
| **Sexual Orientation** | No |  |

Is there any evidence that the policy may result in any less favourable treatment, discrimination, harassment or victimization as detailed below:

| **Potential outcome of the policy** | **Delete as appropriate** | **If yes, give details of the potential outcome and any project modifications to mitigate the risk** |
| --- | --- | --- |
| Result in less favourable treatment for particular groups | **Yes** / No / No evidence | If pay by phone was the only option it might result in less favourable treatment for disabled or older people. For this reason, we would ensure there was another method of payment in addition to this option or advise exemption from payment.  A process had been put in place at both Tentsmuir and Glentress to mitigate the impacts of the barrier and modern technology parking systems in operation and to provide free access for Blue badge holders. |
| Give rise to direct or indirect discrimination | **Yes** / No / No evidence | If pay by phone was the only option it might result in direct or indirect discrimination for disabled or older people. For this reason, we would ensure there was another method of payment in addition to this option or advise exemption from payment.  A process had been put in place at both Tentmuir and Glentress to mitigate the impacts of the barrier and modern technology parking systems in operation and to provide free access for Blue badge holders. |
| Give rise to unlawful harassment or victimisation | Yes / No / **No evidence** |  |

Section 4: Meeting our General Equality Duty

| **Enter below which aspects of the Policy, Practice or Project seek to eliminate unlawful discrimination, harassment and victimisation** |
| --- |
| The policy will ensure that pay by phone technology will not be implemented at our sites as the only form of payment method or, If this is the only payment type possible, advise when a visitor is exempt from payment.  The policy will ensure we carefully consider the tariffs we charge at our sites so they do not present a barrier to those on low incomes. All sites are free of charge to those arriving by public transport and money-saving annual parking passes are available covering all sites. 60% of FLS forests remain free offering alternative free locations for recreation.  A process has been put in place to provide the same free access for Blue Badge holders at Tentsmuir and Glentress.  Paying for parking of vehicles can be a contentious subject. The FLS Car Park Management Staff Guidance is an essential training document for all staff who manage our charging car parks or deal with parking enquiries by phone or email. This includes guidance regarding dealing with difficult situations, lone working safety, de-escalation of difficult situations and when to walk away/end a phone call. It also contains lots of FAQs and answers to help answer visitors questions satisfactorily and explain FLS policies, many of which are also on our parking web page forestryandland.gov.scot/parking. This is supported by annual Car Parking Management Teams training as the start of the main season or throughout the year as required, the FLS Complaint Handling training and other training delivered by the FLS Health, Safety and Wellbeing team. Area Visitor Services Managers should write a local car park management risk assessment for their staff to follow detailing local-specific monitoring protocol including when to escalate a situation, seek back-up and withdraw. |

| **Enter below which aspects of the Policy, Practice or Project seek to advance equality of opportunity between people who share a relevant protected characteristic and those who do not** |
| --- |
| The research for this assessment has identified that although pay by phone technology can be more difficult or impossible for some disabled people, it can also make it much easier for those with a different type of disability. Euan’s Guide reported that in general, the ability to use a contactless card to pay is easier than using cash for most disabled people.  FLS continues to provide free parking for Blue Badge holders and those who come by foot, wheel or public transport, disabled spaces closer to our buildings and trails heads and money-saving parking passes for regular visitors.  The feedback from our regular visitor site surveys and feedback from the mountain biking community whom the survey was shared with was that the ability to pay by phone and my contactless card would be the preferred options to cash as many people now have a pay by phone app on their phones from the large providers. Some respondents who answered it would be impossible to pay by phone at sites fed back that they were aware of poor phone signal issues at some sites which would impact their ability to pay using this technology rather than ability to use the technology. FLS carries out signal testing at all charge parking sites to ensure, if the signal is weak, there are alternative cash and annual pass options at these sites or advise where payment is not required. FLS offers 72 hours after every visit to pay. We continually research viable ways of improving signal at our sites to allow card and onsite phone methods to be used.  We advertise clearly the different ways to pay before, at the start of and during visits via our website and onsite signage and how to purchase an annual parking pass and how to get additional help with paying by phone or barrier technology. |

| **Enter below which aspects of the Policy, Practice or Project seek to foster good relations between people who share a protected characteristic and those who do not** |
| --- |
| Having a range of ways to pay, such as pay by phone from the comfort of their vehicle, faster payment using contactless, a pre-purchased parking pass or being able to pay up to 72 hours after a visit means reduced visitor frustration waiting in queues for parking machines on a busy day, embarrassment or frustration for those who need more time to use technology or who’s height might make this difficult.  Improving ways to pay and how to seek assistance and advertising this clearly, will hopefully reduce the barriers for people with protected characteristics visiting our charge parking sites and ensure our sites are diverse and welcoming for all visitors interacting together. |

Section 5: Outcome of the assessment

| **Outcome of the assessment on the Policy, Practice or Project** | **Enter detail below** |
| --- | --- |
| No major change |  |
| Adjust the Policy, Practice or Project | Extra ways to pay such as pay by phone, ANPR and more contactless card machines are planned to be implemented over the next 1-3 years. We have expanded our money saving parking pass scheme to ensure it covers all charging car parks. We will ensure we undertake a local EqIA before introducing charging at a new site. |
| Continue to Policy, Practice or Project |  |
| Stop and remove the Policy, Practice or Project |  |

| **Detail below recommendations, including action required, to address any negative impacts identified** |
| --- |
| Extra ways to pay such as pay by phone, ANPR and more contactless card machines are planned to be implemented over the next 1-3 years. We have expanded our money saving parking pass scheme to ensure it covers all charging car parks.  Ensure the web site pages are regularly updated to make ways to pay and tariffs clear before the start of the visit as well as highlighting Blue Badge exemptions.  Our site Visitor Experience Planning tool has been updated to include a section to ensure local equality considerations have been taken into account regarding charge parking. |

Section 6: Monitoring

| **Describe below how you will monitor the impact of this Policy, Practice or Project**  *E.g. performance indicators used, other monitoring arrangements, who will monitor progress, criteria used to measure achievement of outcomes etc.* |
| --- |
| Visitor feedback by the variety of mediums detailed above will continue to be sought and welcomed and considered as part of our regular visitor feedback analysis.  National Visitor Services team members will ensure Regional Visitor Services staff have considered equality during site planning and this is an integral part of our site planning process undertaken by our Landscape Architects.  Our main sites are regularly graded by VisitScotland who allocate a star rating. This includes scores for the visitor experience including charge parking and value for money.  Reviews by Euan’s Guide are regularly undertaken at our sites. FLS welcomes this continued feedback and will action as required.  The Visitor Commercial Manager (VCM) and the Visitor Marketing and Insights Manager will monitor the impact of Charge Parking and action as appropriate. |

| **When and how is the Policy, Practice or Project due to be reviewed?** |
| --- |
| The policy and practice will be reviewed annually by the VCM, as new information is received or as processes change. |

Section 7: Sign off

| **Required information** | **Enter information below** |
| --- | --- |
| Date sent to Equality and Diversity Manager | 27/06/23 |
| Comments from Equality and Diversity Manager | Integrated into EqIA |
| Date signed off by Equality and Diversity Manager | 03/07/23 |

| **Details of Senior Manager who has signed off this Equality Impact Assessment** | **Enter information below** |
| --- | --- |
| Name | Stuart Chalmers |
| Title | National Visitor Services Manager |
| Date approved | 29 August 2023 (for Publication) |

**Appendix 1**

Equality Impact Survey: Using Pay by Phone/Online and Cashless/Contactless charged Parking Technology

**Technology 1:** Pay by phone to a call centre/automated service

**Technology 2:** Pay online via a web site or phone app

**Technology 3:** Pay onsite via a contactless card pay and display machine (no keypad or cash option)

**Q1**  If it were the only option, would the above car park payment technologies make it easier, no different, more difficult or impossible for you/the users you support to pay for parking than other payment methods at our forest car parks? Please give examples if you support different users and any other comments/suggestions?

**Q2.** If applicable, please give us name/details of the group/organisation you are representing and the needs of the people you support.

**Appendix 2**

Equality Impact Survey  
Using Pay by Phone/Online and Cashless/Contactless

charged Parking Technology

The survey was completed by **136** respondents from mid to late September 2020.

Initially the survey was issued to stakeholder organisations only, but laterally it was shared by Developing Mountain Biking in Scotland (DMBinS) via their Facebook page.

The majority of responses were received from individual forest users **(78%)** after DMBinS shared the survey link meaning stakeholder organisations accounted for **22%** of the responses.

Q1 If it were the only option, would the following car park payment technologies make it easier, no different, more difficult or impossible for you/the users you support to pay for parking at our forest car parks (Please tick the most appropriate)

