



**PARKING SERVICES
SPECIALIST SCRUTINY
PANEL
2007/8**

**Final Report
April 2008**

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PANEL FOREWORD

The Parking Services Panel was set up to look at how the council can provide a better standard of customer service to its residents and other motorists and to ensure that the service is a well run one that is fairly, effectively and efficiently doing what it is designed to do.

Five key issues have emerged from the panel's investigations – three relating to customer service and two about parking enforcement's effectiveness as a service. On each the panel has highlighted key recommendations that it would like to see accepted and implemented as a top priority.

The first problem is that people are having to wait too long to be seen in Parking Services' customer reception in Perceval House. Waiting times are regularly in excess of one hour, compared to the council's target of within 10 minutes across council services.

Secondly, parking services need to be made more accessible. Diversifying access to services via the web will have the added benefit of reducing the pressure on the customer reception and staff taking calls. But the council also needs to look at whether it can vary the opening hours of the customer service centre in Perceval House to allow for some evening or weekend opening.

For those who write to or telephone the parking department, the panel has some concerns that they are not consistently receiving responses on time and of sufficient quality, therefore the panel is recommending that an action plan be developed to deal with areas of poor performance.

In terms of the focus of the enforcement service, the panel wants to see its business planning much more closely aligned with the outcomes that are most important to residents, such as dealing with dangerous parking and driving and preventing inconsiderate drivers from obstructing the roads.

Finally, Parking Services' needs to do much more work to publicise the often complex and potentially confusing rules of the road in London and thereby help motorists avoid fines, to explain the rationale behind parking and traffic enforcement and not least to show how the money raised is spent.

In closing I would like to take this opportunity to thank everyone involved in the work of the panel for their time and contributions.



Councillor Philip Taylor
Chairman of the Parking Services Panel

1. INTRODUCTION

1.1 Background

The Parking Services Specialist Scrutiny Panel was established by Overview and Scrutiny Committee on 19th April 2007. The purpose of the panel was to identify improvements and look at whether the council's parking department is being run well and to make sure that permit holders and other motorists are receiving a high standard of customer care.

1.2 Methodology

The panel held five public meetings over the course of the year, receiving written submissions from the public and a number of reports and presentations from Parking Services and the research and consultation team including benchmarking data from other local authorities in London. One of the panel's meetings took the form of a dedicated public forum event to allow residents and other stakeholders to share their views in workshop sessions.

Outside of their meetings panel members played the role of "mystery shoppers" to gain an insight into how good the council's customer service is when it comes to dealing with things like buying a parking permit, reclaiming a vehicle from the car pound or challenging or paying a fine. Councillors also shadowed parking attendants on their beats as well as council staff who deal with parking enquiries in the customer reception and over the telephone.

In addition, the panel actively sought the public's views by commissioning a number of questions to be asked as part of the council's first Residents' Panel Survey, sent to approximately 2,000 residents in August 2007. The responses to this survey were invaluable to the panel in providing it with statistical support in areas where the evidence provided to the panel was otherwise solely anecdotal.

A brief summary of the results of the Residents' Panel Survey on perceptions of parking services is contrasted below with the results of the 2007 Residents' Survey on views of the council *as a whole*. Given the nature of the parking service these results are perhaps not surprising, but they do provide a point of reference from which the panel believes the service should endeavour to improve.

Figure 1: Residents' views

	Results for Parking Services from August 2007 Residents Panel Survey	Results for the council from the 2007 Residents' Survey
To what extent do you agree that the council/Parking Services...	% Strongly agree/ agree (see footnote 1)	% Strongly agree/ agree
is doing a good job	30%	77%
has staff that are friendly and polite	24%	67%
responds quickly when asked	16%	51%
is efficient and well run	18%	69%

Although the 2007 Residents Survey asked for residents' views on a range of council services it did not seek their views on Parking Services. There is potential for a question on Parking Services to be included in the 2008 Residents Survey – hence the following recommendation.

Recommendations

To Cabinet:

R1 That, from the September 2008 Residents Survey onwards, Parking Services be added to the list of services on which the following question is asked: "I would like your opinion of the local services in Ealing even if you have not had any direct experience of them. What is your opinion of..."

1.3 National context

Parking enforcement has been subject to a significant amount of scrutiny in recent years, particularly so in London. In 2005 the London Assembly undertook an investigation into parking enforcement in the capital, concluding that the boroughs need to do more to improve public perception of their parking services and to demonstrate that the way they carry out enforcement is fair and proportionate.

1 Results for the 'strongly agree' and 'agree' categories were amalgamated for ease of analysis. The percentage range across all four of these questions for the Residents' Panel survey was 2.2%-7.3%

In June 2006 the House of Commons Transport Committee published a report on parking policy and enforcement. The Summary of the report records that “In addition to the main task for introducing a unified system of parking enforcement [bringing together police and local authority powers] the following action is required:

- Clear performance standards in applying parking restrictions must be established
- It must be made clearer to drivers what regulations are in force and how compliance is to be achieved
- Appropriate recruitment, remuneration and training is needed to ensure a professional parking service throughout the country
- The process for challenging penalty charge notices must be made much more transparent
- The impact of the parking adjudication service must be increased and its profile heightened
- Scrutiny of local authority parking departments is woefully inadequate and needs to be strengthened
- Local authorities must develop parking strategies which meet local objectives fully, focusing particularly on congestion, road safety and accessibility”

The following extracts from the report’s more detailed conclusions and recommendations are of particular relevance to this panel:

Scrutiny of local authority parking operations

- “...The inspection regime should examine not only the accounts, efficiency of the operation and any allegations of maladministration, but also the professionalism of the service....(Recommendation 16)

Performance Indicators

- “...It is a significant flaw in the existing reporting requirements that the optional performance indicators for local authority parking activity deal only with parking infrastructure in place, and therefore fail to provide insights into the standard of enforcement service. A ‘customer service’ attitude towards residents, businesses and visitors to the area in all aspects of the parking operation needs to be encouraged. The standards achieved must be monitored and published.”
(Recommendation 17)
- “Compliance with parking regulations is the most important measure of performance within a parking enforcement regime. This can be measured by roadside surveys, and some local authorities undertake such evaluations now. All councils engaged in decriminalised parking enforcement should be required to do so. The key performance indicators should illustrate how efficiently and effectively local authorities are conducting civil parking enforcement, and the level of focus on ‘customer service’...(Recommendation 18)

New regulations introduced under Part 6 of the Traffic Management Act 2004 (TMA) will come into force on 31st March 2008, replacing previous legislation.

The key changes relating the work of the Panel can be found in the draft statutory and operational guidance. The TMA stipulates that local authorities must have regard to the information contained in this guidance. The key changes are as follows:

1. **Authorities should not view Civil Parking Enforcement [CPE] in isolation and overall it should contribute to the authority's transport objectives.** "By increasing complaints through clear, well designed and enforced parking controls, CPE provides a means by which an authority can effectively deliver its wider transport objectives." [Draft statutory guidance to local authorities on the civil enforcement of parking contraventions, p5.]
2. Authorities should **publish their parking policies** and a code of practice setting out the standards and guidelines that their Civil Enforcement Officers [CEOs] must follow.
3. A stronger emphasis on **staff training**, with a recommendation that all CEOs should hold accredited qualifications.
4. **Time limits** are introduced for dealing with formal and informal representations.
5. Authorities should **review their parking policies and CPE regimes on a regular basis** in consultation with local stakeholders with a range of different parking needs.
6. Authorities should **publish an annual report**, including financial data, enforcement statistics and performance against targets.

1.4 Ealing context

The council's 2006 Corporate Plan includes a theme of 'Organisational Improvement' for which the strategic goal is to "be a consistently high performing organisation focused on the needs of our communities".

Objectives relevant to the panel's work are to:

- "be in the top 25% of London boroughs for overall resident satisfaction rate and 80% amongst key user groups
- be recognised as being in the top 25% of local authorities within London for value for money and financial management
- ensure that 75% of residents feel Council services are accessible and it is easy to do business with the Council"

The Corporate Plan also includes the following specific commitment for the years 2007-10 under the objective of "Ensuring local traffic management is sensitive to local needs":

- "review programme for new controlled parking zones and cost of permits frozen for four years"

Two other significant points about the Ealing context are that:

- in 2006, the council and its enforcement contractor, APCOA Ltd., adopted a new contract closely modeled on the British Parking Association's model contract; and

- running concurrently with the panel's work has been a review of Controlled Parking Zones (CPZs) led by Highways Management.

1.5 Acknowledging diversity

The Panel sought a range of public views by inviting comments through an article in *Around Ealing* and by holding a public event, during which participants divided up into workshop sessions.

The Panel was aware of the need to take into account the interests of different types of road and service users, especially in terms of making the service accessible to the widest possible range of Ealing residents.



Councillor Ann Chapman out on patrol with the borough's parking attendants as part of the panel's mystery shopping exercises

2. FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

This section of the report presents the panel's findings and conclusions. It is suggested that rather than turning straight to the table of recommendations in section 6, the panel's recommendations are best read in the context of the full report. Some of the panel's conclusions take the form of formal recommendations to Cabinet, while others provide suggestions to the service. The panel's key recommendations are highlighted in bold.

Perhaps surprisingly, the panel found that the residents' concerns about parking do not centre on on-street enforcement practices, but rather on the administration of controlled parking zones and standards of customer service when it comes to sorting out permits and enquiries about tickets. Where enforcement practices appear to be generating widespread dissatisfaction is where the council is enforcing parking and traffic regulations using CCTV cameras. Such dissatisfaction in turns tends to give rise to complaints that the council is trying to "catch people out" to make money.

The panel's findings are presented under the following headings:

A better standard of customer service:

1. Customer reception waiting times
2. Accessibility of services
3. Responding to written and telephone enquiries

A more effective service:

4. Objectives of the parking enforcement service
5. Communicating with motorists

2.1 Customer reception waiting times

The panel believes that residents and other customers who visit Parking Services' customer reception in Perceval House should be getting a better standard of service. For many residents the experience of applying for or renewing a parking permit will be one of their only direct contacts with the council.

The principal issue is that there is not enough capacity to deal with the number of visitors, particularly at peak times. As a result customers have to wait too long to be served, with waiting times regularly exceeding an hour during busy periods. In the three months to December 2007 the average waiting time for all parking enquiries was 40 minutes, compared to 15 and 25 minutes for enquiries relating to environment services and council tax respectively. Only 25% of parking services' customers were seen within 10 minutes, the council's current target for all visits in person as set out in its customer service charter.

Figure 2: Customer service centre waiting times

Service		Sept '07	Oct '07	Nov '07	Dec '07	Jan '08
Parking Services	Av. wait time (mins)	33.6	52.6	33.7	49.55	32.06
	% within 10 mins	28.5%	16.5%	30%	13%	36%
Environmental Services	Av. wait time (mins)	10	20.02	15.3	9.12	9.15
	% within 10 mins	75%	50%	55%	64%	62%
Active Ealing	Av. wait time (mins)	12.19	8.58	5.5	6.4	6.7
	% within 10 mins	70%	78%	96%	77%	80%
Council Tax	Av. wait time (mins)	16.1	26.4	32.1	15.41	15.17
	% within 10 mins	58%	43%	36%	53%	44%

The panel commends the council's target of reducing waiting times to 10 minutes across all services. In the case of Parking Services, it believes that specific action needs to be taken to remedy the poor standard of service, through a combination of increasing capacity in the reception (a maximum of five customers can currently be served at any one time) and reducing demand. Whilst expanding online service provision, for example (see section 2.2.2), may to some extent reduce demand for face-to-face enquiries the panel believes that the current need to present personal documentation as proof of eligibility and obtain permits and vouchers in hard copy will mean that visiting the customer reception will remain the preferred option for many people for the foreseeable future.

In addition, while the panel does not seek to make overtly prescriptive recommendations on operational matters, it believes that two key changes should be made to make more effective use of resources and improve the customer experience, namely:

- i. Customers should not have to queue once to apply for a permit or vouchers and then a second time to make payment. Currently cash or cheque payments must be taken at a separate cashier's desk;
- ii. Parking Services should consider deploying queue walkers to ensure that customers have the right documents and are in the right queue and to resolve any straightforward enquiries/ take card payments.

Recommendations

To Cabinet:

R2. The capacity of Parking Services' customer reception in Perceval House to deal with customers should be increased so as to reduce waiting times in line with the council's 10-minute target.

R3. Customers should not have to queue once to apply for a permit or vouchers and then a second time to make payment.

2.2 Accessibility of services

The second key concern of the panel is that the parking department needs to make its services more accessible to its customers. The panel is recommending a variety of ways in which this should be done but its two key recommendations are that the opening hours of the customer reception should be varied and that parking services should be available online.

2.2.1 Customer reception opening hours

Parking Services' customer reception and the Perceval House customer service centre as a whole are currently open 9am-5pm Monday to Friday, making it inaccessible for a majority of those residents and other customers who work standard hours. This represents a significant reduction in service for the parking reception, which was previously open on Saturday mornings prior to its move to Perceval House. As discussed in the previous section, visits to the customer service centre for parking and other services will continue to be the preferred, and at times only, option for many people regardless of the development of alternate forms of service provision.

The panel believes that, following the examples of many other councils across London, there is no reason why the opening hours of the customer service centre cannot be varied to improve accessibility. This does not mean that the centre should be open for longer, which would entail significant additional costs, but that for instance it could close one morning or afternoon during the week to allow for a late evening or Saturday opening. If implemented, the panel believes this recommendation would have a hugely positive impact upon accessibility across customer services.

Recommendation

To Cabinet:

R4. The opening hours of the customer services reception should be extended to 7pm on Thursday evenings to make services more accessible for those who cannot visit during standard hours.

2.2.2 Online services

In contrast to many London boroughs the only parking service available online in Ealing is paying a Penalty Charge Notice (PCN). For permit and voucher transactions application forms must be requested by telephone or collected in

person from the customer reception then posted back or handed in along with payment. The manifest inefficiency of this process was something that came across very strongly in responses to questions in the Residents' Panel Survey commissioned by the panel. The panel believes this should be immediately changed so that application forms can be downloaded from the web. In the medium term, by the end of the 2008/09 financial year, the panel would like to see all parking transactions available online.

Informal representations (i.e. those submitted within 14 days of a PCN being issued) submitted by email will be accepted, but this is not publicised on the PCN itself or on the council's website. The service told the panel that the primary reason for this was that it feared an increase in the volume of correspondence for any given PCN and the corresponding pressure on the service, given the relative ease with which emails can be sent, which the panel accepts. The panel also heard that representations submitted by email must be physically transferred onto the service's database. Both these issues could be resolved by the use of online forms, as used for instance by Harrow, Kensington & Chelsea and Waltham Forest in London to accept informal and formal representations online.

The panel notes that relevant statutory guidance to the Traffic Management Act 2004, due to come into force on 31st March 2008, removes any doubt that formal representations can be submitted electronically, by confirming that "it is for the authority to decide the media that may be used for making formal and informal representations (i.e. writing, e-mail, telephone)"² with the proviso that there is an adequate audit trail to show what has been said. The panel therefore recommends that motorists should be able to make both informal and formal representations against a PCN online.

Recommendations

To Cabinet:

R5. In the short term, customers should be able to download permit/voucher application forms from the Ealing website.

R6. All parking services, including making both informal and formal representations against a PCN, should be made available online by the end of the 2008/09 financial year.

2.2.3 Applying for permits and vouchers

Through written submissions, the Residents' Panel Survey and at the public forum event many residents told the panel that they found the lack of an over-the-counter service for permits and vouchers following Parking Services'

² Statutory guidance, p.75

move to Perceval House very frustrating. The panel was therefore pleased to see an over-the-counter service for visitor vouchers reinstated in September 2007 following the public forum event, also extended to permits in December 2007. This means that residents can now collect permits and vouchers the same day that they are applied for, rather than having to wait for them to be delivered by post. The panel's only criticism here is that these service improvements have not been sufficiently publicised, coming as news to panel members themselves at the November and January meetings.

This notwithstanding, the panel would like to see the service go further in making the permit and voucher applications process easier. One suggestion made a number of times to the panel is that it should be possible to purchase or at least collect visitor vouchers across the borough and not just from Perceval House in Ealing Broadway. With this in mind the panel recommends that the council should investigate the feasibility of making use of other council-run premises, such as libraries, for the sale or collection of visitor vouchers.

A number of residents have also expressed dissatisfaction with the proof of residency that is required to obtain a residents' permit, particularly when renewing a permit. The panel understands the need for regular residency checks to prevent fraud, and recognises that the service has relaxed its requirements in recent months. At the same time it believes there is scope to go further, particularly for permit renewals, by linking in with the council's own council tax records to provide an automatic residency check.

A particular problem arises for residents who wish to purchase visitor vouchers but do not own a residents' permit. Whereas permit holders need only to supply their permit number to show they are eligible, non permit holders must provide proof of residency each and every time they wish to purchase a book of vouchers. The panel suggests that there is no reason why a record cannot be set up for a non permit holder akin to that for a permit holder so that a residency check is only required on an annual basis as opposed to every time a purchase is made.

Recommendations

To Cabinet:

- R7. The council should investigate making use of other council-run premises, such as libraries, for the sale or collection of visitor vouchers.
- R8. Proof of residency requirements, particularly for permit renewals, should be relaxed, by linking in with council tax records.
- R9. Non permit holders should not be treated differently to permit holders when applying for visitor vouchers once they have provided proof of residency in the first instance.

2.3 Responding to written and telephone enquiries

It has been noted that people not getting a reply or not getting an adequate reply from parking services to their written representations against PCNs is an issue in some members' casework. Anecdotal evidence provided to the panel supports this assertion. The council's parking enforcement contractor, APCOA, handles informal representations on the council's behalf, whereas formal representations are dealt with in-house. Both have a target of responding to all correspondence within 10 days, however the panel has to date not been provided with any performance data more recent than April 2007.

The service has sought to assure the panel that sufficiently robust measures are in place to track correspondence and that daily audit checks by team leaders ensure that responses are addressing all of the points raised by the appellant. In the absence of any performance data in respect of turnaround times or quality of responses the panel's concerns nevertheless remain.

Similarly, a notable number of respondents to the Residents' Panel Survey complained about the processing times for postal applications for permits and vouchers and about lost applications. The service was commended for improving its performance in this area from the August 2007 figure of 40% of permit applications processed (i.e. from receipt to posting) within the 4-day turnaround target to the reported figures of 74% and 78% in October and November respectively. *However, revised data was subsequently provided to the OSC (see Figure 3 below) recording the October and November figures as 49.8% and 46.97% respectively.*

It was of concern to the Panel that the remaining 20% of applications in this period (*as the Panel was informed at the time*) took an average of 2-3 weeks to be processed. Extensive turnaround times for postal applications may also tend to increase pressure on the customer reception as customers opt to apply in person instead.

Call centre performance is detailed in the following tables.

Figure 3: Written enquiries

Service		Aug '07	Sept '07	Oct '07	Nov '07
Permit applications and renewals	Av. turnaround time (working days)	8.12	7.1	5.91	5.13
	% within 4 working days	40.46%	34.57%	49.80%	46.97%
Visitor voucher applications	Av. turnaround time (working days)	12.5	12.3	8.0	9.6
	% within 4 working days	13.62%	43.52%	60.62%	54.53%
Informal representations (APCOA)	Av. response time (working days)	44.5	57.0	60.0	73.0
	% within 10 working days	7.88%	3.1%	0.9%	0.4%
Formal representations (in-house)	Av. response time (working days)	38.5	36.0	24.0	21.0
	% within 10 working days	15.54%	9.7%	23.0%	45.6%

Figure 4: Telephone enquiries

Service		Sept '07	Oct '07	Nov '07	Dec	Jan
PCNs (x6565)	Av. waiting time (mins)	4 min	2min 12s	2min 54s	2min 37 s	2min 32s
	% answered within...30s	36%	32%	21%	23%	25%
	Abandonment rate	18.1%	15%	19%	19%	18%
	% resolved at first point of contact (90% target)	99%	99%	99%	99%	99%

The same data as presented in the above table was requested for the General Enquiries telephone number (X6677). However, the Panel was informed that the data was not available because this is a manually operated telephone number.

It is recommended that the Parking Services and Customer Services should jointly develop an action plan to ensure that all customers are receiving timely and quality responses to their written and telephone enquiries and to address areas of poor performance.

The panel acknowledges that ensuring written responses to representations are of a continuous high quality is challenging. In light of the usefulness to the panel of the parking questions in the Residents' Panel Survey in identifying key areas of concern and providing statistical weight to anecdotal evidence, it is suggested that the service may wish to work with the research and consultation team to undertake a survey of appellants' satisfaction with responses received. The service may furthermore wish to consider using customer satisfaction data as a performance measure and/ or strengthening the ability of customers to provide feedback.

Recommendations

To Cabinet:

R10. Parking Services should develop an action plan to ensure that all customers receive timely and quality responses to their written enquiries.

2.4 Objectives of the parking enforcement service

2.4.1 Wider transport objectives

The Government's new guidance to Part 6 of the TMA makes clear that local authorities should aim to increase compliance with parking restrictions as a means by which they can deliver their wider transport objectives i.e. ensuring expeditious movement of traffic, improving road safety and managing and reconciling competing demands for kerb space. "As far as possible, the

performance of contractors and of staff should be judged according to how far desired transport objectives have been achieved.”³ In Ealing Parking Services is responsible for the enforcement of parking and traffic regulations, whereas Highways Management and transport planners are responsible for their design and implementation. For the former, therefore, the objective in this narrower sense should be 100% compliance with regulations.

The panel has received no evidence that there is a ‘golden thread’ linking the service’s day-to-day operations to compliance or any of these wider transport objectives. Outputs such as the amount of enforcement activity undertaken (i.e. parking attendant patrol hours – a performance measure for the council’s enforcement contractor) may be a good indicator of the likelihood that an illegally parked vehicle will be issued with a PCN. However it does not follow that this is leading to a successful outcome for the service: that compliance is improving or in other words the number and duration of contraventions is coming down.

The panel is encouraged that the service plans to undertake compliance surveys after the new TMA regulations come into force on 31st March 2008. The panel recommends that measures of compliance should be integrated into the service’s business plan and developed as a key indicator of its effectiveness. Creating a strong link between the work of the service and the council’s wider transport objectives is critical to improving public perception and refuting the charge that the purpose of parking and traffic enforcement is to generate income for the council.

2.4.2 Financial management and controls

These were clearly lacking last year when the service recorded a £10 million shortfall against budget. Although a large part of this was driven by the undoing of over-generous accruals from previous years and the impact of the Barnet judgement, the outturn for the year was worse than could be accounted for by just these two factors. The service has not been able to account for itself adequately and gives little confidence in its ability to predict and deliver financial outcomes. This is not to say that the service should act like a revenue-raising business but it should be able to model and assess the impact of policy decisions and their effect on driver behaviour and give early warning to the council’s central finance section of the resultant outcomes.

The panel believes Parking Services also needs to place more emphasis on the fact that it is providing a service for residents. The service should promote itself to residents and encourage them to contact it with their enforcement requests where vehicles are parked dangerously or obstructively or illegally taking up space, possibly via text message or online. Residents’ requests should be dealt with as a priority by the service, demonstrating that contraventions actually causing a nuisance are those of most concern to the council.

³ Operational guidance to local authorities on the civil enforcement of parking contraventions, p.85.

Finally, in respect of the growing use by the council of CCTV cameras to enforce parking and traffic regulations, it is suggested that an objective set of criteria should be developed to help determine when and where their use is appropriate. Whereas the panel received relatively few complaints about the enforcement contractor's on-street practices, the use of CCTV, in particular (but by no means confined to) around Ealing Broadway Station, was clearly a cause of concern for many people. Widespread feelings that this is a "revenue raising exercise" or form of "entrapment" could be defused if the council is able to show that CCTV is being used in response to demonstrable issues with non-compliance rather than to supplement or maintain parking income.

This set of criteria may include one or more of the following requirements:

- that there must be a trigger for enforcement such as a certain level of complaints from the public or a survey demonstrating a certain level of non-compliance;
- that the council should review the regulations in place prior to implementation to check they are clear and fair to different road users;
- that a publicity campaign and a grace period during which warning notices are issued should precede formal enforcement.

Recommendations

To Cabinet:

R11. Compliance with parking and traffic regulations should be developed as a key performance indicator for Parking Services.

R12. Parking Services should encourage residents to contact them with their requests for enforcement and these should be dealt with as a priority.

R13. An objective set of criteria should be developed for the appropriate use of CCTV cameras to enforce parking and traffic regulations.

2.5 Communicating with motorists

At the first meeting of the panel in July 2007 an illuminating discussion took place about the controversy around the use of CCTV outside Ealing Broadway Station. It revealed that most people were unaware that stopping on double yellow lines to allow passengers to board and alight is permitted under the Highway Code. In this case the solution that motorists had intuitively felt was the least obstructive was to pull up across the entrance to an out of use access road, albeit one marked with zig-zag lines, which conversely attracted a £100 fine.

A point made to the panel throughout its investigations is that motorists have a responsibility to know the basic facts of the Highway Code. But as was

noted by the House of Commons Transport Committee in 2006, that such confusion appears to exist reflects poorly on the efforts of councils and the DfT to communicate adequately with the public on this matter.⁴ A parking service properly focussed on improving compliance with regulations, as a means of achieving wider transport objectives, should accordingly place much more emphasis on raising motorists' awareness and helping them to avoid unintentional parking violations. The panel is therefore recommending that Parking Services' should develop a communications strategy, and consider joint working with other local authorities and the DfT, to improve understanding of parking regulations and provide additional guidance on parking in the borough. The department's work on a draft code of practice is a good start, but the real challenge will be how to deliver this information to the public. Recent work by the council to promote the changes to the waste and recycling collections provides a benchmark against which this should be measured.

Better publicity will also help to explain the rationale behind parking and traffic enforcement and improve public perception. Again, this will need to go hand in hand with re-orientating the service around the outcomes discussed in section 2.4. As the Department for Transport has observed in its operational guidance: "There is often a lack of understanding about why parking enforcement is needed at all, with its role in keeping traffic moving and roads safe either misunderstood or under-valued."⁵ Indeed under the new regulations local authorities will be required to publish both their parking policies (in effect a code of practice) and an annual report, including financial data, enforcement statistics and performance against targets.

The panel is also recommending that the service reviews all the correspondence it sends out to make sure the process for challenging a PCN is fully explained at every stage. By way of an example, the 'How to contest a ticket' section on PCNs is not clear and does not include contact information. PCNs and all charge notices sent by post should be rewritten to make it clear how to challenge a ticket, explaining that informal representations will be accepted in writing by fax, post or online, including contact details for further information.

At its final meeting, the panel received a report on guidance for members on handling parking matters. This highlighted the requirement on the council, arising from the Traffic Management Act 2004, to publish a Code of Practice on parking enforcement procedures. A draft Code of Practice will be consulted on during the first quarter of 2008. The Panel noted that this Code will include a protocol on 'elected members/senior management and challenges to enforcement' setting out the boundaries of member/officer involvement in the procedures. The Panel noted that, subsequent to the approval of the overall Code, there will be a need to ensure that members are familiar with the requirements of this protocol.

4 House of Commons Transport Committee, Parking Policy and Enforcement, Seventh Report of Session 2005-06, p.

5 DfT Draft operational guidance to local authorities on the civil enforcement of parking contraventions, p.108.

Recommendations

To Cabinet:

- R14. Parking Services' should develop a communications strategy to improve understanding of parking regulations and provide additional guidance on parking in the borough.**
- R15. Penalty Charge Notices and all charge notices sent by post should be rewritten to make it clear how to challenge a ticket, explaining that informal representations will be accepted in writing by fax, post or online and including contact details.
- R16. A Code of Practice on parking enforcement procedures should be approved by Cabinet, in line with the requirements of the Traffic Management Act 2004 and after local consultation.
- R17. Arrangements should be made to ensure that elected members and senior management are familiar with the protocol on challenges to enforcement which will be included in the above Code of Practice.

3. KEY LEARNING POINTS

Some of the key learning points identified by the panel about effective scrutiny are that:

- to note that, in addition to the possible outcomes from the panel's final report and recommendations, it has been possible to achieve some modest outcomes during the operation of the panel, eg over the counter services for visitor vouchers and permits
- it was very useful to be able to obtain the views of the public through commissioning questions for inclusion in the council's first Residents' Panel Survey
- the panel also benefited from its interaction with service users – services users' views validated and confirmed the direct experience of Members and ensured these were not viewed as purely anecdotal or subjective
- it was helpful to focus on a single specific service
- and Parking Services seemed to be of the "right size" for a Specialist Panel to scrutinise – it made it possible for the panel to identify a number of practical actions.

4. MEMBERSHIP AND ATTENDANCE

The panel met a total of five times. The panel comprised nine councillors.

The attendance of councillors at panel meetings was as follows:

Councillor	Total possible	Actual attendance	Apologies received	Substituted
Philip Taylor (Chairman)	5	5		
Jasbir Anand (Vice-Chairman)	5	5		
Mohammad Aslam	5	2	1	
Ann Chapman	5	5		
Swarn Singh Kang	5	2	2	
Diana Pagan	5	5		
Elizabeth Reilly	5	3	1	1
John Ross	5	5		
Manjit Singh	5	0	0	3

5. BACKGROUND PAPERS

Parking Services Specialist Scrutiny Panel:

- Terms of Reference;
- Work Programme;
- agendas, reports and minutes, available at www.ealing.gov.uk/services/council/committees/.

Ealing Council's Corporate Plan 2006-10;

Ealing's Sustainable Community Strategy 2006-16, available at www.ealing.gov.uk/services/council/strategies_and_policies/.

Parking Services Service Plan 2007/8

Parking Appeal Statistics 2005-06 (PCN, Clamp, Remove) – London Councils

Department for Transport Traffic Management Act 2004

- Parking Policy and Enforcement – Operational Guidance to Local Authorities – Draft for consultation 8 August 2007
- Statutory guidance to Local Authorities on Civil Enforcement of Parking Regulations – Draft for consultation July 2006

Draft Statutory Instruments 2007 No.0000 Road Traffic, England – The Civil Enforcement of Parking Contraventions (England)

- General Regulations 2007
- Representations and Appeals Regulations 2007

House of Commons Transport Select Committee

- Parking Policy and Enforcement – Seventh Report of Session 2005-06 Volume 1
- Parking Policy and Enforcement – Government Response to the Committee’s Seventh Report of Session 2005-06

6. OFFICER COMMENTS ON THE RECOMMENDATIONS

The panel’s final recommendations along with the comments of relevant service officers are detailed in the following table. These come from Philip Burns (Head of Parking Services), Alison Reynolds (Head of Customer Services) and Naomi Hill (Head of Research and Consultation) as indicated in the table.

TABLE OF RECOMMENDATIONS

Recommendations to Cabinet [Key recommendations are in bold]	Service officer comments (including any financial, legal and other key implications)	Cabinet Response
A better standard of customer service		
R1	<p>That, from the September 2008 Residents Survey onwards, Parking Services be added to the list of services on which the following question is asked: "I would like your opinion of the local services in Ealing even if you have not had any direct experience of them. What is your opinion of..."</p>	<p>Adding parking services as an option to the recommended question in the main residents survey will not only provide annual data on how satisfied residents are with parking services overall but also allow the council to differentiate between the levels of satisfaction of users and non users of parking services.</p> <p>It should be noted that the cost of the residents survey is contained within policy and performance budget and therefore there are no implications to adding Parking services to the existing list of services on the survey, so long as there are no changes to this budget.</p> <p>There will also be no legal implications to adding parking services to the existing list of services on the survey, nor will the additions negatively affect the quality of the survey. <i>Naomi Hill (Head of Research and Consultation)</i></p> <hr/> <p>Accepted. <i>Philip Burns (Head of Parking Services)</i></p>
Accepted		

Recommendations to Cabinet [Key recommendations are in bold]		Service officer comments (including any financial, legal and other key implications)	Cabinet Response
R2	The capacity of Parking Services' customer reception in Perceval House to deal with customers should be increased so as to reduce waiting times in line with the council's 10-minute target.	The number of reception staff has been increased from 4 to 5 since January 2008. Other customer service staff are being cross-trained to assist when the queues become particularly busy. Customer Services has developed an improvement plan for 08/09, improving waiting times is a key part of this plan. <i>Alison Reynolds (Head of Customer Services)</i>	Accepted
R3	Customers should not have to queue once to apply for a permit or vouchers and then a second time to make payment.	Customer Services has looked at whether this is possible. However, due to the amount of cash collected in the Centre, security would be breached if staff took cash over the service desk points. Customers are informed they can pay by card at the service points. <i>Alison Reynolds (Head of Customer Services)</i>	Accepted - for card paying customers

Recommendations to Cabinet [Key recommendations are in bold]	Service officer comments (including any financial, legal and other key implications)	Cabinet Response
R4	<p>The opening hours of the customer services reception should be extended to 7pm on Thursday evenings to make services more accessible for those who cannot visit during standard hours.</p>	<p>This is possible to implement and would apply to all services delivered in the Centre if funding was made available for additional staffing and facilities costs. Estimated costs of opening until 7pm on Thursday is:</p> <ul style="list-style-type: none"> • Staffing - £55,000 per annum worst case scenario, based on overtime, or if terms and conditions were re-negotiated then it would probably reduce to £45,000. <p><i>Alison Reynolds (Head of Customer Services)</i></p> <p>Facilities</p> <ul style="list-style-type: none"> • Security cover: £50 per week (so £2,600 per annum) • Technical services (ie heating, lighting and ventilation) approx £500 per week (so £26,000 per annum) <p><i>Dave Allen (FM Operations Manager)</i></p>
R5	<p>In the short term, customer should be able to download permit/ voucher application forms from the Ealing website.</p>	<p>Application forms are planned to be available online by March 2008.</p> <p><i>Philip Burns (Head of Parking Services)</i></p> <p>Update: as of 4th April printable PDF Permit and Visitor Voucher Application forms are available online for customers to download, print and return by post.</p>

Recommendations to Cabinet [Key recommendations are in bold]		Service officer comments (including any financial, legal and other key implications)	Cabinet Response
R6	All parking services, including making both informal and formal representations against a PCN, should be made available online by the end of the 2008/09 financial year.	Web forms can be introduced for informal representations. We are evaluating whether formal representations can be facilitated online. <i>Philip Burns (Head of Parking Services)</i>	Accepted
R7	The council should investigate making use of other council-run premises, such as libraries, for the sale or collection of visitor vouchers.	We will investigate the feasibility of this recommendation. <i>Philip Burns (Head of Parking Services)</i>	Accepted
		Customer Services will be liaising with the library service regarding the delivery of simple transactions through the libraries. Permits and visitor vouchers will be one of the proposed services to be delivered. <i>Alison Reynolds (Head of Customer Services)</i>	
R8	Proof of residency requirements, particularly for permit renewals, should be relaxed, by linking in with council tax records.	This has been implemented on a trial basis and will be reviewed in April 2008. <i>Philip Burns (Head of Parking Services)</i>	Accepted
		This is possible. Arrangements will be made to meet with the Head of service in Council tax to progress this. Viewing access to council tax records will need to be made available and training provided. <i>Alison Reynolds (Head of Customer Services)</i>	

Recommendations to Cabinet [Key recommendations are in bold]		Service officer comments (including any financial, legal and other key implications)	Cabinet Response
R9	Non permit holders should not be treated differently to permit holders when applying for visitor vouchers once they have provided proof of residency in the first instance.	Accepted and implemented. <i>Philip Burns (Head of Parking Services)</i>	Accepted
		There is no differentiation between the two permit holder types when applying for visitor vouchers as long as the provide proof of residency. <i>Alison Reynolds (Head of Customer Services)</i>	
R10	Parking Services should develop an action plan to ensure that all customers receive timely and quality responses to their written enquiries.	The service has developed an improvement plan for 2008/09 and this is a key aim of the plan <i>Philip Burns (Head of Parking Services)</i>	Accepted
A more effective service			
R11	Compliance with parking and traffic regulations should be developed as a key performance indicator for Parking Services.	Accepted. This is a requirement of the Traffic Management Act 2004, which comes into affect on 31 March 2008. <i>Philip Burns (Head of Parking Services)</i>	Accepted
R12	Parking Services should encourage residents to contact them with their enforcement requests and these should be dealt with as a priority.	Accepted. Information on enforcement requests will be circulated to all residents and businesses. <i>Philip Burns (Head of Parking Services)</i>	Accepted

Recommendations to Cabinet [Key recommendations are in bold]		Service officer comments (including any financial, legal and other key implications)	Cabinet Response
R13	An objective set of criteria should be developed for the appropriate use of CCTV cameras to enforce parking and traffic regulations.	This is included within the draft Code of Practice document and will be further reviewed prior to finalisation of the CoP for submission to Cabinet. <i>Philip Burns (Head of Parking Services)</i>	Accepted
R14	Parking Services' should develop a communications strategy to improve understanding of parking regulations and provide additional guidance on parking in the borough.	Accepted. This has been included in the 2008/09 Service Plan. <i>Philip Burns (Head of Parking Services)</i>	Accepted
R15	Penalty Charge Notices and all charge notices sent by post should be rewritten to make it clear how to challenge a ticket, explaining that informal representations will be accepted in writing by fax, post or online and including contact details.	Accepted. The next batch of PCN stationery will include this information. <i>Philip Burns (Head of Parking Services)</i>	Accepted
R16	A Code of Practice on parking enforcement procedures should be approved by Cabinet, in line with the requirements of the Traffic Management Act 2004 and after local consultation.	Accepted. The CoP should be submitted for Cabinet approval in June 08. <i>Philip Burns (Head of Parking Services)</i>	Accepted

Recommendations to Cabinet [Key recommendations are in bold]		Service officer comments (including any financial, legal and other key implications)	Cabinet Response
R17	Arrangements should be made to ensure that elected members and senior management are familiar with the protocol on challenges to enforcement which will be included in the above Code of Practice	Accepted. Guidance will be issued to Members and Officers following Cabinet review of the Code of Practice. <i>Philip Burns (Head of Parking Services)</i>	Accepted