

CANTERBURY CHRIST CHURCH UNIVERSITY

Draft Car Parking Equality Impact Assessment Report December 2010 (Stage 2)

1. Introduction

Equality Impact Assessment (EIA) is a systematic analysis of a policy or procedure to establish whether it affects different groups of people in different ways and to identify opportunities to promote equality.

The EIA of the Car Parking Policy was conducted by a working group which met twice and it used the data listed below. It has produced eleven recommendations about staff permits for the Car Parking Task and Finish group to consider. It has not made any recommendations with regard to students but outlines a number of issues for ongoing consideration.

1.1 Working Group

Veronica Cousins, Facilities Administration Manager
Keith Gwilym, Pro-Vice Chancellor- Learning and Quality
Sarah Johns, Human Resources Advisor
Su Keogh, Front of House Manager
Moirra Mitchell, Equality and Diversity Manager
Mike Murray, Deputy Director of Facilities
Margaret Scott, Manger of Student Support Services

1.2 Data Used

- I. Staff data set (dated 19/11/10) presenting permit allocation by gender, ethnicity, disability, faculty, campus, FT equivalency and grade.
- II. Summary of key issues raised by staff provided by Facilities Department.
- III. Summary of staff correspondence provided by the Senior Management Team.
- IV. Student data sets analysing permit allocation by gender and disability.
- V. Consultation with other universities and the Equality Challenge Unit.

2. Staff Data Analysis

Table 1: Protected Characteristics Data (19/11/10)	No	%	Uni %
Total permits allocated	631		
Total permit holders with equality data available	614		
Disabled staff permit holders	52	8.5%	6.8%
Ethnic Minority staff permit holders (total declared 600)	30	5%	5.4%
Female staff permit holders	413	67.3%	63.1%
Male staff permit holders	201	32.7%	36.9%

2.1 Disability

Table 1 indicates that 8.5% of permit holders have declared a disability, compared with 6.8% of the total staff population. It is to be expected that the representation of disabled staff amongst permit holders would be higher than in the total staff population (although it would not be possible to predict the margin of difference).

The current policy requires disabled staff who are blue badge holders to apply for a permit but does not require them to pay for permits. The number of blue badge holders working for the University is unknown and the number of free permits that have been issued to blue badge holders has not been routinely recorded. Anecdotal evidence from notes kept suggests that four blue badge holders have been given permits.

There is a lack of clarity about how the criteria for disabled staff who are not blue badge holders are being applied. The criteria state that staff with a "temporary disablement" may apply for a temporary permit but some staff have submitted evidence of permanent disability and been awarded permanent permits for which they have paid.

Currently the University is charging some disabled staff (non-blue badge holders) for permits and not charging other disabled staff (blue badge holders). There is no evidence to support the need for blue badge holders to receive free permits and the current policy is untenable as it creates a two-tier system for disabled staff. Other universities consulted charge blue badge holders the same rate as other staff members.

The lack of data about blue badge holders also raises the issue of whether the University has an appropriate number of disabled parking bays.

Recommendations:

- I. Blue-badge holders should be required to pay for permits in the same way as other staff.
- II. The policy relating to disabled staff who are not blue badge holders should be redrafted to clarify that if medical evidence is provided they can qualify for permanent permits (whilst maintaining temporary permits for temporary mobility difficulties).
- III. All staff should be asked to inform the University if they are blue badge and permit holders so that the number of disabled parking bays can be reviewed accordingly.

2.2 Ethnicity

The percentage of permit holders from an ethnic minority background (5%) is similar to that of the total staff population (5.4%) indicating that the policy does not have an adverse impact on this group of staff. Furthermore there is no evidence from the qualitative data to suggest adverse impact.

2.3 Gender

The percentage of permit holders who are female (67.3%) is higher than the percentage of females in the total staff population (63.1%) which might suggest that male staff are less likely to apply for or receive a permit. However female staff are measurably disadvantaged by the policy on the following grounds:

- a) 80% of part-time staff are female (compared to 63.1% of the total staff population). Unless they work precisely 0.5 FTE, part-time staff pay proportionally more for their permits than others in the same pay band (as there are only two tiers of payment, 0.5 FTE and full-time).
- b) Female staff are more likely to have childcare responsibilities and these are not currently included in the criteria for awarding permits. This issue is raised in a significant number of the complaints about the policy received from staff.
- c) On the Salomons campus a substantial number of female staff have requested that full names are not displayed on parking permits as this can make them vulnerable in certain situations.
- d) No allowances are currently made for the mobility problems that can be encountered by pregnant women.

Recommendations:

- IV. Permit charging should be recalibrated to include a range of levels of FTE (for example, 0.2, 0.4, 0.5, 0.6 and 0.8).
- V. An all-staff email should be issued as soon as possible requesting staff to indicate whether they would apply for a permit a) if caring for children under 16 was a criterion and b) if caring for children under 13 was a criterion.
- VI. Depending on the outcome of 5 above, childcare should be added to the criteria.
- VII. Full names on parking permits should be replaced with University user names.
- VIII. Pregnancy should be introduced as a criterion for a temporary permit provided this has been recommended by a risk assessment.

2.4 Distribution of Permits across Faculties

Table 2: Faculty Data (19/11/10)	No Permits	No Staff	%
(17 permit holders have no faculty info)			
Applied and Social Sciences	82	154	53.2%
Arts and Humanities	10	110	9.1%
Business and Management	41	67	61.2%
Education	143	203	70.4%
Health and Social Care	156	232	67.2%
PVC Academic	22	50	44%
PVC Learning and Quality	37	131	28.2%
Senior PVC	16	145	11%
Strategic Director Resources	97	174	55.7%
VC	11	15	73.3%

Table 2 indicates a large variation in the percentage of staff who have received parking permits across the University faculties. The variation is likely to reflect different types of jobs across the faculties and in particular the numbers of staff who are required to drive for work.

Recommendation

- IX. The Senior Management Team should be asked to comment on whether the distribution of permits appears as would be expected. If it is not, further scrutiny of how the policy is being implemented should be undertaken.

2.5 Discretionary Permits and Sessional Staff

Sessional staff are not able to apply for parking permits but have access to departmental or visitors permits at the discretion of their Head of Department. No quantitative data is available about this group but concerns have been raised indicating there may be a loss of staff due to the added cost and inconvenience of sessional work at CCCU.

Recommendations

- X. Each department should be provided with a small number of additional discretionary permits to increase provision for unique cases which cannot be taken into account in the policy.
- XI. The Senior Management Team should be requested to gather more information about the parking needs of sessional staff in their faculties.

2.6 Data Limitations

The number of permit holders has not been analysed by grade or age. This would be a time consuming task and may not render useful conclusions as the majority of staff who need to drive for work are in more senior roles. However in the future consideration should be given to analysing distribution by age as there is likely to be a link to disability. This is particularly true in light of the removal of the default retirement age.

3. Student Data Analysis

Table 3: Campus and Gender	Female	Male	Total	% Female	% Male
Broadstairs	22	19	41	54%	46%
Hall Place	211	27	238	89%	11%
Medway	360	42	402	90%	10%
Salomons	39	6	45	87%	13%

Table 4: Campus and Disability	Total
Canterbury	11
Medway	1
Broadstairs	3

As table 3 and 4 indicate, the data relating to student permits is not as detailed as that relating to staff but the following points can be noted:

- The high representation of female students with permits on most campuses reflects the nature of the courses they are attending.
- A substantial number of the complaints received from students resulted from the fact that the new criteria were introduced part-way through a course which raised issues of equity in terms of the number of occasions a permit would be required. These issues should not be replicated in the future.
- Staff who work with disabled students are given visitors permits and this appears to be working satisfactorily although it should be kept under review.
- Charging for permits for short courses is challenging and should the University introduce a substantial number of new short courses, it may need to reconsider the use of pay and display facilities.
- There are no specific recommendations arising from the EIA in relation to students.

Shuttle Bus

The shuttle bus is intended to provide an accessible service for students who are unable to walk easily between the North Holmes Road site and Augustine House. The bus has been adapted to carry one wheelchair, but other than that no adjustments have been made to suit the new support and Library arrangements using Augustine House, and the buses primary function continues to be serving Hall Place.

Very little use is made of the bus by students generally between Augustine House and North Holmes Road, and less by disabled students due to a number of factors. The main deterrents to use of the bus by disabled students, according to their representative, are the time the bus leaves North Holmes Road, lack of frequency, the need to travel via Hall Place as the return bus stop at the Bus Station is not useful, the lack of proper wheelchair fixings and awareness of the drivers, and the North Holmes Road stop being at Old Sessions.

Proposals have been made to replicate the Dial-A-Bus service, but discussions with the bus operator have shown that this would be very expensive. Taxis are offered to students who cannot use the bus, and the cost is covered either by Disabled Students Allowances or by the disability budget within Student Support Services. The bus operator has made another offer to pick up disabled students on request and this will be tried again in the New Year.

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