

# Equality Impact Assessment (EqIA)

<b>Title of work</b>	Southeastern Car Parks Automated Number Plate Recognition (ANPR) Installation
<b>Department</b>	Facilities/Passenger Services
<b>Date</b>	29/11/23

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## Document History

Version No.	Date	Reason for Issue
V1	29/11/2023	Southeastern Car Parks ANPR Installation
V2	02/10/2023	Updates added following attendance at EqIA panel.
V3	13/08/2024	Further PSED considerations explored

## Document Approval and Sign-off

		Name and Job Title	Signed	Date
<b>Part A and B</b>	<b>EqIA Owner</b> (The person responsible for completing the EqIA)	Facilities Department		29/11/2023
Prepared in collaboration with Passenger Services, Commercial, Finance and Communications and Stakeholder Relations departments				
<b>EqIA Panel review date:</b>		02/02/2024		
<b>EqIA Panel decision:</b>		Approval to continue		

# Equality Impact Assessment

## What is an Equality Impact Assessment and why do we need one?

An Equality Impact Assessment is a way of looking at decisions, policies and practices systematically to understand any disproportionate impact and how they could potentially affect groups of people sharing the same protected characteristic.

At Southeastern Railway, we see EqIAs as so much more than filling in a form. The process is designed to create an inclusion mindset that can impact the way decisions are made within our organisation. To ensure inclusion and equality are considered in every aspect of our organisation.

## When do we need to complete an EqIA?

The EqIA is required for projects/ pieces of work that may have an impact on our colleagues or passengers. It is a living document and should be reviewed as work progresses and changes. If you are unsure, take a look at part A in this document or head over to the EqIA SharePoint page for more guidance: [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

EqIAs are integral for identifying negative and potential adverse impacts but also give us a great opportunity to promote amazing work in equality and inclusion.

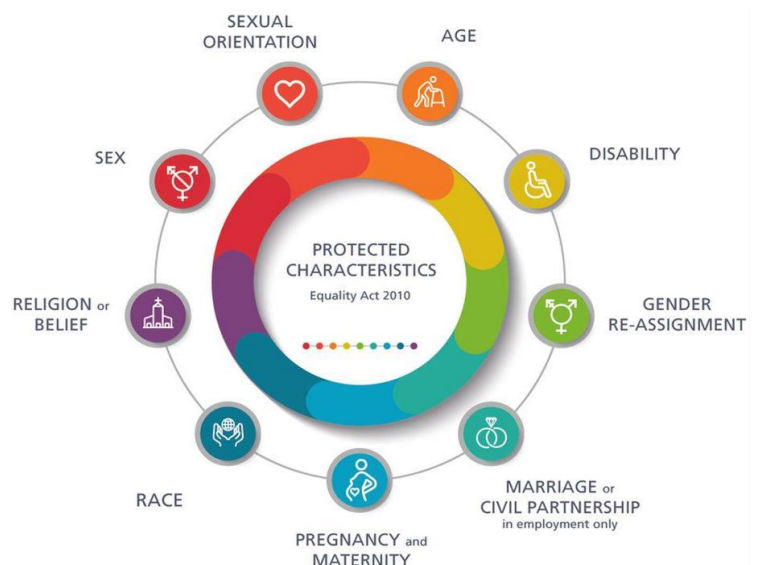
As a public sector organisation, we have duties under the [Public Sector Equality Duty](#) to:

- Eliminate prohibited conduct
- Advance equality of opportunity
- Foster good relations

## Protected Characteristics

The different groups reviewed in the EqIA are outlined in the [Equality Act 2010](#) and are referred to as protected characteristics these are:

- age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex,
- sexual orientation.



## Some examples

- The introduction of a new system for colleagues to use. Therefore, considerations need to be made around accessibility features to ensure it is inclusive to those who are neurodiverse or with visual impairments or colour blindness for example.
- Changes to uniform policy such as the introduction of shorts for front-line colleagues. This might include gender-inclusive sizing options and maternity wear.
- When assessing the impacts of taking a platform lift out of service, you may identify that the platform is now inaccessible to anyone who is unable to navigate stairs. Therefore, a workaround needs to be implemented and communicated between staff and passengers.
- When changing the seat covers, carpets and table covers. An impact assessment may identify that there are too many colours, patterns and textures for some individuals which may cause sensory overload.
- When there are engineering works, audio and visual information is needed. This enables the information to reach those who are visual impaired, D/deaf, adults and children who are unable to read and for individuals where English is not their first language.
- The introduction of a new IT systems for colleagues to use. Therefore, considerations need to be made around accessibility features to ensure it is inclusive to those with visual impairments or colour blindness.

# Part A: EqIA Preliminary Questions

1. Please tick any of the protected characteristics below which your work may impact?

- Age
- Disability
- Gender reassignment
- Marriage and Civil partnership
- Pregnancy and Maternity
- Race
- Religion
- Sex
- Sexual Orientation

If you have ticked any of the protected characteristics above. Please continue onto part B.

If you have not ticked any of the boxes above, please provide justification below as to why you do not think the project will impact people with protected characteristics.

Explanation as to why there are no impacts expected for people with protected characteristics.

Notes here:

# Part B: EqIA

## 1. Please select the type of EqIA from the list.

- The built environment
- Events & Communications
- Policies & Standards
- Information Technology IT
- Change Programmes (reorganisations, transformations)
- Procurement
- Digital experience
- Retail and ticketing
- Branding & Marketing
- Other, please specify

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**2. Please provide a summary of the work this EqIA is referring to.**

In addition, please attach any supporting materials such as maps, images, project plans.

Question	Response
<p>What are the aims/objectives?</p>	<p>Southeastern is introducing Automatic Number Plate Recognition (ANPR) technology at 45 Southeastern station car parks (38 stations as some stations have more than one car park). This technology captures car registrations when vehicles enter and exit, removing the need for customers to place a ticket in their car windscreen. It is expected to go live in early 2025.</p> <p>Preparations for this change are already underway as the ANPR equipment is currently being installed. However, it will not affect customers or colleagues before it is enabled in early 2025</p> <p>As ANPR involves the installation of cameras - which are monitored 24/7 - it will enhance safety and security by minimising the risks associated with misuse or antisocial behaviour, helping to create a more secure environment for customers and colleagues.</p> <p>By upgrading technologies, some processes will be streamlined, reducing manual intervention and freeing up staff to focus on delivering better customer experiences.</p> <p>The introduction of ANPR and associated payment options will provide a more convenient and simpler experience for many customers as they will not need to display a ticket in their vehicle. This is particularly helpful for customers with mobility challenges as it will remove the need to return to their vehicle and also speed up their overall journey time.</p> <p>The reduction in physical ticketing will contribute to sustainability efforts by</p>

	<p>decreasing paper waste and supporting eco-friendly practices. As well as enabling customers to access and find digital receipts which often get lost or accidentally thrown away.</p> <p>This development will bring Southeastern into line with other London commuter TOCs like GTR and South Western Railway as well as Network Rail and other public sector operated car parks.</p>
<p>Where will the change take place?</p>	<p>Selected car parks across managed Southeastern stations.</p>
<p>Will our colleagues be impacted? (If yes, please provide a brief summary of why)</p>	<p>No – Colleagues will already have a car parking permit that will allow parking within the station car park</p>
<p>Will our customers be impacted? (If yes, please provide a brief summary of why)</p>	<p>Yes – physical (ie, paper) parking tickets will no longer be available for purchase at the ticket office. Parking can be purchased via several digital channels (App, web and ScanPay) over the phone or by text (SMS) as well as at Ticket Vending machines (TVM) located at the station. Digital channels will only use card payment. However, the TVMs will continue to accept cash, alongside card/ payments. To allow pick ups and drop offs to continue without incurring a charge, a free ‘grace’ period of 20 minutes will be implemented.</p> <p>Disabled customers who hold a blue badge will need to register their vehicle on the APCOA Blue Badge Portal. This allows individuals to register up to 10 different vehicles. This EQIA recognises that blue badges belong to the holder and not the vehicle and therefore requires action from holders to register their vehicles. However, this approach is commonly used at other ANPR car parks and is an effective solution to ensure blue badge holders can continue to park for free while protecting against fraud and misuse.</p>



<p>When is the expected completion date?</p>	<p>The switch to the ANPR system including payments is expected to be in early 2025.</p>
<p>Are there any other details you would like to share?</p>	<p>Current electronic payments methods have been in place since April 2021 since the removal of all Pay &amp; Display machines. This setup is similar to how many other car parks, including those operated by councils, function. The new system will introduce the option to Auto Pay by signing up to “pay as you go” in Southeastern’s ANPR car parks. There will be a grace period to “Late Pay” allowing a customer to pay 24 hours after arrival at a station. There will also be a drop off/pick up window of 20 minutes to allow free use for these purposes. TVM user interfaces will be updated to provide the ability to pay and input a vehicle registration number. Blue Badge permit holders will continue to be able to park free of charge in a vehicle which has been registered via the number plate.</p>

**3. Please review each of the protected characteristics below. How does this work impact people with protected characteristics?**

For each category, there are some prompt questions to assist you with the sort of considerations that need to be made.

Please write your considerations in the white boxes below each protected characteristic. Then fill in the “RAG after mitigation” box with the corresponding colour and score.

RAG rating	High Impact 3	Medium Impact 2	Low Impact 1
High Probability 3	9 High Impact expected	6 High Impact expected	3 Medium Impact expected
Medium Probability 2	6 High Impact expected	4 Medium Impact expected	2 Low impact expected
Low Probability 1	3 Medium Impact expected	2 Low Impact expected	1 Low Impact expected

Probability

- Likelihood of the impact

Impact

- How much it will impact someone.

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
Customers will no longer be able to pay for parking at the ticket office.	Age	Y	We are enabling ticket vending machines (TVM) to connect to the ANPR system to allow customers to buy tickets and pay with cash at the station TVM. If they pay at a TVM, they will not have to return to the car but will be issued with a ticket and a receipt. If the TVM is out of service please use one of the alternative advertised methods of payment. If the customer is unable to do so and they are subsequently issued a Penalty Notice, they may appeal explaining their situation. We will alert APOCA if there are any machines out of service at our stations.	1
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		
	Religion	Y		
	Sex	Y		
	Sexual Orientation	Y		
	Gender Reassignment	Y		

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
Customers will no longer be able to receive physical tickets for parking sessions within the car park	Age	Y	If you choose to pay at a TVM you will be issued a physical ticket but you will not need to display this on your car.  The new ANPR payment system offers customers multiple ways to document their payments:	1
	Disability	Y		
	Marriage/ Civil Partnership			

	Pregnancy/ Maternity		<p>APCOA App: Customers can easily monitor their purchases directly through their smartphones.</p> <p>APCOA Connect: Receipts are available to customers who provide their email address at the time of purchase. Receipts can also be accessed via the app or through the self-service account history for those with an APCOA Connect account.</p> <p>ScanPay: Receipts are provided to customers who enter their email address at the time of purchase.</p> <p>Digital Season Tickets: Receipts are sent to customers via email and can also be accessed through their self-service account history.</p>	
	Race			
	Religion			
	Sex			
	Sexual Orientation			
	Gender Reassignment			

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
Those who don't use digital services and applications may struggle to use an App or website to purchase parking.	Age	Y	While many older or disabled people may use digital tools like smartphones, websites, or SMS, some may not. For those who don't, payment can be made by phone at 01895 262122 or by texting 07860 006000, quoting the Location Code found on the tariff board in the car park. Alternatively,	1
	Disability	Y		
	Marriage/ Civil Partnership			
	Pregnancy/ Maternity			

	Race		<p>customers can pay at TVM using the same method accepted by the machine</p> <p>There will be a grace period to "Late Pay" allowing a customer to pay 24 hours after arrival at a station. There will also be a drop off/pick up window of 20 minutes to allow free use for these purposes. Where available, staff can assist them with using the TVM.</p>	
	Religion			
	Sex			
	Sexual Orientation			
	Gender Reassignment			

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
Some customers may be affected by changes to their routine and find this disruptive to their activities.	Age		An awareness campaign is being developed and will be launched ahead of the change using a wide range of media to reach a cross section of demographic groups and those with protected characteristics. This will include station posters, car park signage, media releases, emails to registered customers and stakeholders and details on our social media channels.	2
	Disability	Y		
	Marriage/ Civil Partnership			
	Pregnancy/ Maternity			
	Race			
	Religion			
	Sex			
	Sexual Orientation			
	Gender Reassignment			

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
How will customers who use cash or don't have a card pay?	Age	Y	We are upgrading our TVM's to allow customers to continue to buy parking tickets at the machines that will link to the ANPR	2
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		

	Religion	Y	system. Where cash payments are currently accepted they will have the option to pay with cash.
	Sex	Y	
	Sexual Orientation	Y	
	Gender Reassignment	Y	

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
How will the new ANPR system impact blue badge holders?	Age		Blue badge holders already have the option to register up to 10 cars on the APCOA Blue Badge Portal. This will ensure vehicles will be automatically exempt from enforcement. Blue badge holders should continue to display their blue badge to avoid a penalty notice being issued. APCOA undertakes physical patrols of the car parks, which includes checking for customer compliance with allocated Blue Badge parking areas, so a visible check of the displayed Blue Badge by the patroller is the best on-site checking process. Seeing Blue Badges on display deters other customers from abusing the spaces - this reassures other Blue Badge customers that spaces are not being abused by non-Blue Badge customers	1
	Disability	Y		
	Marriage/ Civil Partnership			
	Pregnancy/ Maternity			
	Race			
	Religion			
	Sex			
	Sexual Orientation			
	Gender Reassignment			

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Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
How does the ANPR system protect the privacy and data of all users, including vulnerable groups?	Age	Y	APCOA's GDPR-compliant signs, displayed across UK locations, inform customers about how their data may be utilised by APCOA in the management of the car park. Customers can view APCOA's full data protection statement here: <a href="https://www.apcoa.co.uk/data-protection/">https://www.apcoa.co.uk/data-protection/</a> . For more information on how APCOA handles, stores, and may use collected data under our 'legitimate business interest,' please refer to our privacy policy at <a href="https://www.apcoa.co.uk/privacy-policy/">https://www.apcoa.co.uk/privacy-policy/</a> .	1
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		
	Religion	Y		
	Sex	Y		
	Sexual Orientation	Y		
Gender Reassignment	Y			

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
Are there any known biases in the technology or data processing that could affect customers with protected characteristics?	Age	Y	To our knowledge and APCOA's there are no known biases in the associated technology or data processing.	1
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		
	Religion	Y		
	Sex	Y		
	Sexual Orientation	Y		
	Gender Reassignment	Y		

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
I only use your car parks to drop people off will I still need to pay?	Age	Y	Many of our stations have designated pick-up and drop-off areas that do not require entering the car park. For stations without these designated	1
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		
	Religion	Y		

	Sex	Y	<p>areas, or if customers choose to use the car park for drop-offs and pick-ups, a 20-minute grace period is provided from the time the vehicle enters the camera zone to allow for dropping off or picking up passengers. After this time a payment may be required at the applicable tariff.</p> <p>If the person you are picking up is delayed, please note that we have not configured the system with a "no return time." This means you may drive through the area as many times as needed to avoid exceeding the 20-minute stay limit.</p>	
	Sexual Orientation	Y		
	Gender Reassignment	Y		

Considerations See Appendix for prompt questions	Characteristics	Impact ? Yes or no?	Mitigation	RAG after mitigation
<p>I am going to require assistance in order to pay how long do I have to make payment?</p>	Age	Y	<p>APCOA are committed to providing a website that is accessible to the widest possible audience, regardless of technology or ability, with their website designed to conform to level Double-A of the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.0. <a href="https://prebook.apcoa.co.uk/accessibility">https://prebook.apcoa.co.uk/accessibility</a></p> <p>Additionally, we are upgrading our TVM's to allow customers to continue to buy parking tickets at the machines that will link to the ANPR system. Where cash payments are currently accepted they will have the option to pay with cash.</p>	2
	Disability	Y		
	Marriage/ Civil Partnership			
	Pregnancy/ Maternity			
	Race	Y		
	Religion			
	Sex			
	Sexual Orientation			
	Gender Reassignment			



			The ANPR system will allow payment for parking up to 24 hours after arrival by using 'LatePay' using a bank card on APCOA's Connect website.	
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Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
What communication channels are being used to inform diverse groups about the ANPR system and its benefits?	Age	Y	An awareness campaign is developed and will be launched ahead of the change using a wide range of media to reach a broad range of demographics and those with protected characteristics. This will include station posters, car park signage, media releases, emails to registered customers and stakeholders and details on our social media channels	1
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		
	Religion	Y		
	Sex	Y		
	Sexual Orientation	Y		
	Gender Reassignment	Y		

Considerations See Appendix for prompt questions	Characteristics	Impact? Yes or no?	Mitigation	RAG after mitigation
How will security at car parks be maintained if patrol staff are not available in future?	Age	Y	All patrol staff will continue to be available to focus on maintaining orderly parking. In addition, they are available to assist customers with any questions or concerns and providing guidance on using our parking systems.	1
	Disability	Y		
	Marriage/ Civil Partnership	Y		
	Pregnancy/ Maternity	Y		
	Race	Y		
	Religion	Y		
	Sex	Y		
	Sexual Orientation	Y		
	Gender Reassignment	Y		

**4. What could you do to ensure your work has a positive impact on diversity and inclusion?** *Have you considered people impacted by socio-economic deprivation? Here is good place to acknowledge this*

Space to answer here:

At the start of the contract with APCOA, we spoke in depth about supporting Blue Badge holders and ensuring the portal was considerate of their requirements.

Our comms plan and equality impact assessment remains flexible and open to feedback to ensure we consider the needs of our customers in all areas we can.

We have modified our approach to roll out to make sure it takes place after the installation is complete making it more straightforward for our customers.

We have taken care to provide a wide range of different payment channels including providing a cash option. We are briefing our station teams and patrol staff.

**5. What information sources have you used and who have you engaged with to review the impacts on equality?**

Space to answer here:

We have engaged with the following organisations who have implemented ANPR  
APCOA who are specialists in ANPR  
Medway Council – another public sector organisation who have already introduced ANPR  
Network Rail – A public sector, rail station parking provider  
British Transport Police

## 6. How will you monitor the impact of your project/piece of work on equality once it has been put into effect?

*Examples include, customer feedback, surveys, mystery shoppers, insights, twitter responses, footfall, increase in sales, increase in revenue, reduction in time, changes in footfall, internal review.*

Space to answer here:

We will track responses of customers via:

- Queries and contacts received by our customer relations team
- Customer Satisfaction Survey – which includes a question on car parking facilities
- Closely monitoring stakeholder feedback (including MPs, councils, rail user groups, employers and other representative groups across the network
- Sales and revenue data
- Car park occupancy
- Penalty notices
- Incidences of crime, vandalism and other antisocial behaviour

## 7. Is there anything else you would like to add?

Space to answer here:

## 8. After completing this EqIA, what is your decision?

An EqIA is outcome-driven, not process-driven and it is expected that projects may change if they highlight an unfair or disproportionate impact on a certain group. After completing the EqIA there are five possible outcomes;

- **Change the work** to mitigate against potential negative impacts found
- **Continue the work** because no potential negative impacts found
- **Proceed with caution** in the knowledge that this project may favour some people more than others (please provide justification for this decision)
- **Complete a more detailed EqIA** if the programme of work is complex/large scale and requires a more detailed review
- **Stop the work** because discrimination is unjustifiable and there are no obvious ways to mitigate

### EqIA author decision:

Change the work	Continue the work	Proceed with caution	Complete a more detailed EqIA	Stop the work
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### EqIA panel recommendation (to be completed by the panel).

Change the work	Continue the work	Proceed with caution	Complete a more detailed EqIA	Stop the work
<input type="checkbox"/>	<input checked="" type="checkbox"/> Please update the EqIA as per the conversation and pointers raised during the panel meeting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 9. What actions are required following the completion of the EqIA?

Action	By when?	By whom?
Ensure all internal and external comms are easy to understand and that comms in alternative formats are offered as an alternative	November 2024	Southeastern Communications
Include a QR code on comms that takes customers to relevant websites	November 2024	Southeastern Communications
Ensure the impact on blue badge holders is highlighted in all comms and consider specific comms for these customers	November 2024	Southeastern Communications
Update the EqIA following conversations with the EqIA panel. The EqIA panel is made up of representatives from across the business with relevant expertise and lived experience, who make informed recommendations on the next steps for a project. The panel is a key step in Southeastern's internal governance process.	October 2024	Southeastern Facilities
Update TVM's to connect to the ANPR system to allow customers to buy tickets and pay with cash if the machine allows	December 2024	Southeastern Retail Operations

## 10. Submission

**Please note, if anything changes that impacts the EqIA, this will need to be updated and resubmitted to the panel.**

Once you have completed all sections of the EqIA and engaged relevant stakeholders, please ensure this document (along with any referenced evidence, relevant documentation or other items that you would like this document to be

reviewed alongside) is signed off by your Line Manager or Department Head as well as the EqIA Panel.

## Appendix

### Age

- Have generational differences been considered?
- Are activities accessible for all ages?
- Have differences in learning and working styles been considered?
- Is the activity technology dependent? (e.g. are email addresses required?)
- Have the distances of any detours and stepped access been considered?
- Have different communication channels been considered?
- Will the changes impact any youth groups, schools, community groups etc?
- Is the project perpetuating stereotypes?

### Disability and/or caring responsibilities

- Do the changes affect visual access? Colour blindness, zoom options, font sizes and colours etc.
- Have subtitles been considered? Audio Description?
- Is imagery representative?
- Have differences in learning styles been considered?
- Is travel required? Is travel accessible to all?
- Are there alternative accessibility options?
- Is a space accessible? Can spaces be altered?
- Are there any changes to lighting levels?
- Will there be any loud noises or flashing lights that may impact someone with neurological differences?
- Is the project perpetuating stereotypes?

### Marriage or in a civil partnership

- What personal details do you need to take?
- Are titles/ relationship indicators necessary?
- Is the project perpetuating stereotypes?

### Pregnancy and maternity

- Are there any hazardous substances or materials used?
- Is the project perpetuating stereotypes?

### Race- Colleagues and customers from ethnic backgrounds

- Is there representative imagery?
- Will it impact people who do not have English as their first language?
- Has the language being used been considered? Should alternative formats be provided?
- Will there be any impacts on the community such as increases in rent/ gentrification?
- Is the project perpetuating stereotypes?

### Religion or belief- Colleagues and customers with religions and/or beliefs

- Have various religious holidays been considered?
- Have any impacts to the community or place of worship been considered?
- Have cultural symbols been used? If so, are they being used accurately?
- Has inclusive language been used?

- Is information available in various languages and formats relevant to the community?
- 
- 
- Is the project perpetuating stereotypes?

## **Sex and Gender Reassignment-**

- Cisgender\*, transgender and non-binary colleagues and customers
- \*Cisgender is when you identify with the sex you were assigned at birth.
- Is the language used non-gendered? Have inclusive pronouns been used?
- Have representative demographics been used?
- Is the project perpetuating stereotypes?
- What personal details do you need to take? Have titles been used? If so, is there a variety for selection (Mr, Miss, Mx)
- Are there any changes to lighting or security which impact people who have had or are undergoing gender reassignment?

## **Sexual orientation- LGBT+ colleagues and customers**

- Are there any changes to lighting or security which may increase vulnerability?
- Is there representative imagery?
- Is the project perpetuating stereotypes?