**SUSTAINABLE DEVELOPMENT, TRANSPORT AND PLANNING COMMITTEE**

**14 MARCH 2017**

**PART I - DELEGATED**

**9. PROCUREMENT OF NEW PARKING ENFORCEMENT CONTRACT – ONGOING INVESTIGATION**

(DCES)

1. **Summary**

* 1. This report provides an update to Committee of the Officer investigations into a new parking enforcement contract with Hertsmere Borough Council (HBC). It also asks the Committee to consider a number of aspects of the parking enforcement service to determine what Councillors want the future parking enforcement service to look like.

2. **Details**

2.1 The existing Parking Enforcement contract ends in April 2018. Members have been provided details on the existing contract arrangements and options for procuring a new contract. Officers were asked to research the alternative opportunities for procuring a new contract for our parking enforcement services. A report was presented to this Committee in November 2016 detailing the opportunities and implications of different models for the parking enforcement service. At the November Committee Members requested further detail on 3 options:

* + 1. Continuation of arrangements with Watford Borough Council (Model with an external service provider) (**shared contract model**).
		2. Provision of a Local Authority service managed by a Lead Authority with a joint Parking Services Manager (**fully shared or partnership model**).

G1. Reduced civil enforcement activities with potential use of new statutory powers.

2.2 Subsequently in January 2017 Members were presented with a paper detailing further investigations on the chosen models. At this Committee Members RESOLVED: (draft minutes):

* That a report be brought back to the Committee on what will inform the Council’s Civil Parking Enforcement Contract (e.g. proposals for the number of Enforcement Officers and the areas they would need to cover).
* To further investigate option D (Provision of a Local Authority service managed by a Lead Authority with a joint Parking Services Manager), with Hertsmere Borough Council and a report to be brought back to Committee.
* Not to commit to a future joint service with Watford Borough Council at this time.
* Not to investigate Option G1 at this stage.

2.3 Since this resolution, officers have spoken to the officers at Hertsmere Borough Council who confirm they are committed and enthusiastic to progress this joint working. They are currently working on a specification of a service they could provide having regard to the existing services at Three Rivers DC but also ensuring there is progression in the service via technological advance to improve efficiencies.

2.4 In addition, officers are in the process of appointing the services of Parking Associates, a leading consultancy in the areas of parking enforcement and parking services, to assist in understanding the advances in parking enforcement and how these could be utilised in our service. This will initially result in a specification to enable ongoing discussions and negotiations with Hertsmere BC.

2.5 To assist these discussions and enable an understanding of the service requirements wanted by Members, there are a number of areas that require a decision to be made on the service to be provided.

2.6 ***What is included in the Service?***

2.6.1 The existing Indigo contract provides to the District Council a frontline service comprising 4 CEOs (including uniforms and equipment. Work transport is via CEOs’ own vehicles with mileage paid) and counter staff at The Parking Shop. These, in addition to the back office staff, handle parking enquiries, processing of PCNs and management and issue of visitor and residents’ permits. No parking enforcement related phone or face to face enquiries are handled by staff at TRDC offices. A direct number is provided for The Parking Shop for parking and permit related enquiries or calls redirected as appropriate.

2.6.2 In addition, the existing contract provides contract management by Indigo, ICT and handheld devices, cash collection services, P&D machines and maintenance.

2.6.3 The District Council has an agreement with Watford BC for them to deliver the management of the Parking Service. This agreement currently costs this authority approximately £80k per annum and includes the following:

* + - Rent and associated building costs for the building containing the Parking Shop in Watford (NB the lease on the Parking Shop expires this year and WBC have taken a decision not to renew. Their parking enforcement function is due to move back to the main WBC offices).
		- Management costs for the parking enforcement service and associated functions of the Parking Shop
		- Representation Officer costs (TRDC currently pay a % of the salary of 2 WBC-employed Written Representations Officers) to assist with TRDC workloads.
* Web, IT and telephony charges.

2.6.4 The management and Representation Officer element includes:

* Indigo contract management,
* processing and administration of Penalty Charge Notices,
* managing appeals and cost recovery,
* managing resident and business parking permits,
* management of car parks,
* management of signage/lines,
* dealing with public enquiries,
* Service marketing,
* management of bailiff contract and three appointed companies.

2.6.5 In addition, the District Council directly employs a Representations Officer who is based at the Parking Shop. Employment of this role directly was a requirement of the contract set up. This is a total cost of £32k per annum. This role undertakes many of the elements in paragraph 2.8.4 in addition to a number of other specific traffic management duties for the District Council.

2.6.6 Separately, TRDC also employ a Traffic Engineer for 3 days a week. This is currently a post which is filled on a secondment basis due to recruitment difficulties but is already a shared post with Hertsmere BC.

2.6.7 Whilst details are still being discussed, Hertsmere BC’s initial proposal included all of the above. They have confirmed they could offer a Traffic Engineer Service (2 days a week, we currently have a 3 day a week role) as well as take on the role of our Written Representations Officer. This would mean that existing elements of the service that are handled by TRDC directly, via the Written Representations Officer, such as management of the business permit and other permits scheme and management of signs and lines would be handled by HBC. This would be subject to further discussions with officers involved and potential TUPE arrangements.

2.6.8 Essentially the parking enforcement service would remain at ‘arm’s length’ as it is now but additional areas of work would be taken off-site. However, this would not prevent officers, such as the Traffic Engineer, working at TRDC or being available for meetings with TRDC officers and Councillors. If TRDC retained a TRDC employed Written Representations Officer they would still need to be located at HBC due to the work processes and integration with work processes and other staff members. There is no clear benefit of retaining our own Written Representations Officer if, legislatively and procedurally, HBC could employ the officer directly. Recent recruitment difficulties in appointing a Traffic Engineer could also be alleviated by HBC providing this role to manage the Parking Programme. TRDC would still retain a level of control over the service through agreed weekly reporting/ regular meetings.

2.6.9 Members have previously suggested they would consider our Customer Service Centre having a role in parking enforcement enquiries including the ability to issue permits. The CSC could potentially have the capacity to handle these low complexity/high volume calls and customer visits following appropriate training but regard would need to be had to the relevant cost of back office IT systems to be provided and how the segregation of these aspects of the service is handled and costed. The provision of a face to face service must also be balanced against the general Council stance of reducing face to face customer contact and utilisation of other means of customer contact. HBC have suggested that a ‘parking surgery’ could be provided at TRDC, for example, once a week, when a member of HBC staff could be based at TRDC offices. Again, regard would need to be had to the sharing of IT systems and associated costs to allow this to occur.

2.6.10 Officers suggest that TRDC continue to explore the service including the Written Representation and Traffic Engineer roles. In addition, the continuation of the ‘outsourcing’ of the whole parking enforcement service in terms of administration and customer contact is recommended, not least due to the potential costs and complexities of shared IT systems and processes. However, officers can continue to explore opportunities to have a parking ‘presence’ at TRDC one day a week, if Members required, possibly with remote access to the HBC systems. Whilst ongoing discussions are required the suggestions of members of the extent of the service to be provided by HBC would be encouraged.

2.7 ***Number of Civil Enforcement Officers (CEOs)***

2.7.1 As part of the existing contract arrangements TRDC have four CEOs. However, these are not specifically designated to TRDC but work across both TRDC and WBC. Two permanently cover Rickmansworth Town Centre and the wider Rickmansworth area, whilst the other two are mobile and move around the District. As part of the existing contract there are agreed enforcement ‘beats’ that are covered and a school rota. There is some level of flexibility in the existing arrangements in that areas can be targeted if requested due to ongoing problems, albeit at the expense of other areas. In addition, if TRDC requested additional CEO cover on a temporary basis, for example an out of hours event or an increased temporary presence outside a school, this could be provided at cost, although this is an aspect of the service that TRDC have not regularly taken advantage of. WBC has deployed their CEOs at no extra cost to TRDC on some occasions.

2.7.2 Members have consistently requested an increased enforcement presence on TRDC streets. Since the start of the current contract in 2008 there has been a general trend of increased car ownership, additional vehicles on the roads and additional measures and restrictions to manage traffic and parking. However, the number of CEOs has remained at four.

2.7.3 The number of PCNs issued has stabilised around the 3,900 mark (see TRDC Annual Report). This stability is a common trend when the restrictions are clearly signed and motorists recognise that parking enforcement is in operation. Nevertheless, the introduction of new schemes and restrictions throughout the course of the year is likely to bring about a slight increase in issuing figures as motorists become compliant with new measures.

2.7.4 Increasing the number of CEOs is possible but at a cost (approximately £25k) and this may not correspond to or be covered by an increase in paid Parking Contravention Notices (PCNs). The primary purpose of Civil Parking Enforcement is to ensure compliance with parking controls and education of motorists. Legislation requires there is not a financial goal. Increased presence may result in a temporary spike in PCNs issued but this may not be sustained as motorists abide by relevant regulations and conditions.

2.7.5 Parking Associates are to be commissioned to carry out compliance check surveys to attempt to understand the general level of compliance in the District which will inform the need for any further CEOs. In addition, they have advised that new, more flexible methods of deployment, aided by technology, may allow the existing level of CEOs to be better utilised. The introduction of P&D parking in the Rickmansworth Town Centre car parks will also be much more efficient in terms of enforcement compared to the current situation.

2.7.6 Notwithstanding the above, the existing shared Parking Services Manager has been asked for his view on the current level of CEOs in the TRDC service based on his knowledge of the existing service.

 *“As advised, individual CEO productivity is not measured, at least not by the Council, but we measure and monitor the number of deployed hours, number of deployed staff, hours in individual areas and overall number of PCNs issued in those areas, which gives an overview of the general level of productivity. All of this information is produced weekly in the weekly reports and supported to some degree within the monthly KPI report. That productivity can only be measured against compliance by carrying out surveys so that the general level of illegal parking in an area can be accounted for. However, compliance can be notoriously difficult to accurately measure because there may be a number of reasons why the circumstances will not be the same during any two visits.*

 *The set up and structure of the BPA contract, together with its KPI mechanism, is the tool used to ensure that the overall performance expectations of the contract are being met. Generally, this has shown that the expected level of deployment, enforcement hours and coverage for Three Rivers has been consistently provided. However, as I have previously advised, it is clear that 4 Civil Enforcement Officers is generally not sufficient to meet the increasing number of restrictions requiring enforcement, particularly when taking into account the number of car parks and schools to be covered, aside from the geographical areas requiring coverage, with many of these requirements growing considerably since the contract was agreed in 2008. I am aware that a different approach to deployment is likely to be taken in relation to any future contract but I would still suspect that more staff than currently utilised would be required to meet the overall enforcement needs, even allowing for flexibility in officer availability and deployment, particularly if evening and Sunday enforcement is additionally required.*

 *As I have previously explained, I do not believe that additional deployment will necessarily result in any form of additional income because a more visible and regular enforcement presence is more likely to increase compliance than illegal parking. Further, an issued PCN does not necessarily equate to a paid PCN because some motorists never had any intention to pay any PCN received and have already taken steps to evade being pursued, whereas other PCN’s will be challenged and correctly cancelled when considered in line with legislative requirements.*

 *I would agree that Three Rivers current levels of deployment would benefit from being increased, which I think will be inevitable even within a service placing the burden on an enforcement contractor to meet enforcement needs, if those needs are to be sufficiently met to meet expectations, and that is likely to result in some increase in compliancy, which would need to be measured by surveys, either by an appointed consultant or by a future enforcement contractor, if they have such capacity, but I think it will have a minimal impact on income, if any at all, aside from an initial spike in locations where enforcement may be carried out with more frequency than current resources allow.”*

2.7.7 It is recommended that the specification document to be produced clearly details the restrictions and areas to be enforced in Three Rivers District. This specification document will then request that any potential Service Provider, initially HBC, details how this enforcement will be met including the number of officers. It may be considered that additional CEO cover is required immediately based on TRDC’s previous experiences, alternatively it may be that flexibility in numbers could be provided. The decision of any Service Provider will be informed by current TRDC experience and evidence, the compliance checks, advances in deployment technology and their own experiences. It is noted that, should additional CEOs be required, they will come at a cost.

2.7.8 What will be required in any future contract is the flexibility of any Service Provider to increase CEO presence if a future need arises or to respond to a request for additional cover on a temporary basis.

2.8 ***Operating hours of the Parking Enforcement Service***

2.8.1 The working hours of the existing CEOs are 8am to 6.30pm Monday to Saturday. They do not work Bank Holidays, Sundays or late evenings. However, due to daily early morning briefings at the existing Parking Shop the CEOs do not start their patrols until approximately 8.30am.

2.8.2 Hertsmere BC’s working hours are currently 8am to 6.30pm Monday to Saturday. HBC are suggesting, as part of their proposals, that they have a permanent base for their CEOs at TRDC which will negate any lost travel time. The cost of this accommodation will be taken into account in the service costings.

2.8.3 Retention of the existing hours (10.5 hours per day) would be encouraged but must tied in with existing and any proposed restrictions, such as the proposed charging in car parks in Rickmansworth. It is for the new provider to ensure appropriate levels of deployment and coverage. It could also be negotiated that hours are extended if Members considered it appropriate.

2.8.4 It is recognised that, due to the small number of CEOs in TRDC, even having one absent will reduce deployment hours significantly. Generally WBC will ensure there are always 4 CEOs deployed in TRDC by losing one from their areas, although it is noted this is not always possible if Indigo are short staffed. Due to the external provider having a pool of CEOs, this has been possible but further information will be required from HBC on how any annual leave or sick leave will be covered in TRDC.

2.9 ***The Role of CEOs***

2.9.1 The Traffic Management Act 2004 has tried to encourage the use of CEOs in a community ambassador type role and suggests they can be used for reporting other issues such as flytipping or vandalism. The statutory guidance states,

 “7.9 The relevant legislation (i.e. Section 76, Traffic Management Act 20014 and Section 63A, Road Traffic Regulation Act 1984) does not expressly prohibit civil enforcement officers and parking attendants respectively from carrying out functions other than those which are related to traffic management. As such, local authorities wishing to appoint officers to carry out traffic management duties, in addition to, for example, environmental enforcement duties, must ensure that neither of their responsibilities is compromised as a result of the integration of duties.

7.10 A civil enforcement officer may be authorised by an enforcement authority to carry out functions under more than one Act. For example, a civil enforcement officer may be authorised under the Traffic Management Act 2004 for the purposes of carrying out parking enforcement duties, and that same civil enforcement officer may also be authorised under environmental legislation for the purposes of carrying out environmental enforcement duties such as issuing fixed penalty notices for littering or dog fouling.”

2.9.2 These additional duties have not been adopted in the current contract arrangements which the Parking Services Manager has advised, *‘has a lot to do with the scale of the areas that require enforcement coverage and the level of resources that are need to secure the coverage.’*

2.9.3 At HBC the CEOs are the ‘eyes and ears’ of the Council and this is suggested for TRDC. Whilst they do not issue fixed penalty notices (FPNs) they are a visible presence on the streets and report issues back to the Council.

2.9.4 It is suggested that from April 2018, as part of any new service, the CEOs play a greater Civic Ambassador role than currently, which could include but not be limited to:

* the CEO or a Supervisor inspecting a location immediately if a hazard is reported to or is spotted there by a CEO which is a potential danger, , , and reporting this to TRDC;
* reporting to TRDC any details of littering, fly tipping, fly posting, graffiti with the exact location;
* reporting to TRDC any building materials deposited within parking bays or anywhere else on the highway or in car parks;
* reporting on suspected abandoned vehicles;
* providing directions and assist members of the public with advice and information on request.

Consideration could be given to CEOs being authorised under environmental and other legislation for the purposes of carrying out environmental enforcement and enforcement duties. This is not something that currently occurs at HBC but, if Members required this to be considered, officers could investigate with HBC. However, it is noted these duties should not constitute the primary role of a CEO, which is to enforce the Traffic Regulations, so the Service Provider will be expected to ensure that the time spent on these duties does not detract unduly from CEOs’ parking/traffic enforcement role.

2.10 ***Key performance Indicators***

2.10.1 As part of the current contract arrangements, TRDC receive weekly reports on aspects of the service such as the number of permits issued, the number of PCNs issued and P&D income, and monthly Key Performance Indicator monitoring. As recommended as good practice by the British Parking Association, TRDC has Key Performance Indicators (KPIs). Based on the achievement of the existing KPIs, CEOs are awarded performance-related pay, which is at a cost of approximately £25K per annum. The KPIs are not based on any financial target but on aspects such as hours of deployment, amount of CEO errors.

2.10.2 The existing KPIs are:

1. Coverage of Patrol Requirements
2. Deployed CEOs
3. IT
4. Customer Services
5. PCNs cancelled due to CEO error
6. Pay and Display
7. Initial Training and Accreditation
8. Regular Assessments
9. Notice Processing – PCN Processing
10. Notice processing - Banking

2.10.3 It is recommended by Parking Associates that we continue to have a number of KPIs in order to monitor the parking enforcement service and these will be discussed with the Service Provider.

2.10.4 HBC do not specifically have KPIs but have advised with regard to CEOs, “we monitor their progress on a regular basis during the day, review their record books, and have an ability to be in constant contact; in addition they have a weekly 1:1 with their immediate supervisor, and a 6-monthly appraisal. Essentially we know it is a tough job  which needs strong oversight and back office support.”

2.11 ***Other Matters***

2.11.1 The existing contract was negotiated for 10 years with a break clause after 5 years. Whilst this may be considered too lengthy to repeat, the contract/service agreement needs to be of sufficient time to enable the service and technology to be embedded and necessary commitment to allow future investment in these.

2.11.2 Due to capital investment, TRDC leisure contracts are predominantly negotiated for a 10-year period with a 3-year extension to be agreed by the Local Authority. However, the provision of the parking enforcement service, especially by using another Council’s existing services, would have more limited capital investment. For Members’ information the existing East Herts service is 5 years with a 2-year extension.

2.11.3 Currently revenue from advertising on the reverse of P&D tickets would be retained by Indigo. However, it is considered appropriate to explore opportunities for advertising on parking tickets and this can be discussed further with HBC or other Service Providers.

2.11.4 Members have been keen to explore technological advances in parking enforcement and this will be further explored with Parking Associates including the capabilities of the IT software currently in used by HBC. In terms of the future plan of HBC in terms of their parking enforcement service they have stated the following:

 “As for the future:

1. HBC is committed to providing on-line (paperless)  permitting, and the new CIVICA system will allow this, I expect this to be complete in the next 18 months.
2. CEO’s hardware will be upgraded again to smart phone technology, we are also considering providing motor bikes/scooters
3. Meters are to be upgraded to accept card transactions, currently we aim to maintain card / cash and on-line ( Pay by Phone) to give the customer options
4. Currently CEO tracking is monitored via PC, a fixed screen in the office will now be added (live) and will include the TRDC operatives ( potentially)
5. We have an on-going programme of CPZ reviews, this is aimed making controlled parking effective, and not having controls in place where they are not needed.”

3. **Options/Reasons for Recommendation**

3.1 The preparation of a specification for TRDC’s future parking enforcement service has commenced but it is ongoing and still requires significant input to shape our future service. Details have been provided on a number of specific areas and Members are invited to add suggestions as part of their final recommendations and raise any further issues they wish for officers to investigate.

3.2 Members have been asked to note and consider:

a) Outsourcing of whole parking enforcement service including all enquiries and management and issue of permits and to include aspects of the parking service such as the Traffic Engineer

1. Number of CEOs and methods of deployment to be determined

by the new Service Provider to ensure appropriate levels of deployment and coverage with ability to increase in the future as required or for special events/requests

1. Flexibility in deployment of CEOs to ensure CEO deployment hours are maintained during periods of absence

1. Hours of service to be determined by the new Service Provider to ensure appropriate levels of coverage with ability to respond to requests for occasional out of hours/special events.

1. Civic Ambassador role of CEOs but to also include investigation of the ability of the CEOs to issue Notices under Environmental and Anti-Social Behaviour legislation.

1. Further consideration of KPIs in accordance with good practice recommended by the British Parking Association.

1. Length of contract
2. Investigation of advertising on P&D tickets
3. Use of technology in the service

4. **Policy/Budget Reference and Implications**

4.1 The recommendations in this report do not have implications for the Council’s agreed policy. In terms of budgets a PID has been prepared for the consultancy and procurement costs. The cost of the provision of the service will depend on the service levels agreed and future negotiation of the service specification. A future report will provide detail of the specification and discussions with Hertsmere BC.

5. **Financial and Legal Implications**

5.1 There are no financial details of the Service to be discussed at this stage. The cost of the new service will be determined by the level of service to be provided. HBC are aware of the current service costs.

5.2 The requirement for new technology, additional CEO numbers and other variations in aspects of the service are likely to incur additional costs but these are currently not known. In some respects service efficiencies, for example by utilising new technology, may reduce certain service costs. The proposed costs of the future service will be presented to Committee in due course.

5.3 The relevant legal procedures will be followed in the investigations and securing of a new parking enforcement service. This will include legal support in the process including the implications for any existing members of staff.

1. **Staffing and Customer Services Centre**

TRDC service requirements and the continuing discussions with HBC will determine the staffing implications. Depending on the options pursued, consideration must be paid to the role of the existing Written Representations Officer, the Traffic Engineer role and to potential transfer of existing staff. This is also likely to include the existing CEOs. The legal implications for staffing would need to be explored further with the Council’s Solicitors.

7. **Environmental, Community Safety, Public Health, Communications & Website.**

None specific.

8. **Equal Opportunities Implications**

8.1 **Relevance Test**

|  |  |
| --- | --- |
| Has a relevance test been completed for Equality Impact? | No  |
| Did the relevance test conclude a full impact assessment was required? | No  |

9. **Risk Management and Health & Safety Implications**

9.1 The Council has agreed its risk management strategy which can be found on the website at http://www.threerivers.gov.uk. In addition, the risks of the proposals in the report have also been assessed against the Council’s duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.

9.2 The subject of this report is covered by the Regulatory Service Plan. Any risks resulting from this report will be included in the risk register and, if necessary, managed within this plan.

9.3 The following table gives the risks if the recommendations are agreed, together with a scored assessment of their impact and likelihood.

|  |  |  |
| --- | --- | --- |
| Description of Risk | Impact | Likelihood |
|  | No risks have been identified. |  |  |

9.4 The following table gives the risks that would exist if the recommendation is rejected, together with a scored assessment of their impact and likelihood:

|  |  |  |
| --- | --- | --- |
| Description of Risk | Impact | Likelihood |
| 1 | Failure to agree a specification with a lack of detail in the specification with subsequent failure to shape and provide an effective and high quality parking enforcement service | III | C |

9.5 Of the risks detailed above none is already managed within a service plan.

9.6 The above risks are plotted on the matrix below depending on the scored assessments of impact and likelihood, detailed definitions of which are included in the risk management strategy. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood are plotted in the shaded area of the matrix. The remaining risks require a treatment plan.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Likelihood** | A |  |  |  |  |  | Impact | Likelihood |
| B |  |  |  |  |  | V = Catastrophic | A = >98% |
| C |  |  | 1 |  |  | IV = Critical | B = 75% - 97% |
| D |  |  |  |  |  | III = Significant | C = 50% - 74% |
| E |  |  |  |  |  | II = Marginal | D = 25% - 49% |
| F |  |  |  |  |  | I = Negligible | E = 3% - 24% |
|  | I | II | III | IV | V |  | F = <2% |
| **Impact** |  |  |

9.7 In the officers’ opinion the new risks above, were they to come about, would not seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of treatment plans are reviewed by the Audit Committee annually.

10. **Recommendations**

 It is recommended that:

10.1The outsourcing of the whole parking enforcement service take place including all enquiries and management and issue of permits and to include aspects of the parking service such as the Traffic Engineer;

10.2 Further decisions on the specification for the Parking Enforcement service be delegated to the DCES in consultation with the Lead Member.

10.3Members suggest any further aspects of the future parking enforcement service that require consideration, such as but not limited to:

a) The number of CEOs and methods of deployment to be determined by the new Service Provider to ensure appropriate levels of deployment and coverage with ability to increase in the future as required or for special events/requests

b) Flexibility in deployment of CEOs to ensure CEO deployment hours are maintained during periods of absence

c) Hours of service to be determined by the new Service Provider to ensure appropriate levels of coverage with ability to respond to requests for occasional out of hours/special events.

d) Civic Ambassador role of CEOs but to also include investigation of the ability of the CEOs to issue Notices under Environmental and Anti Social Behaviour legislation.

e) Further consideration of KPIs in accordance with good practice recommended by the British Parking Association.

f) Length of contract with specialist input

g) Investigation of advertising on P&D tickets

h) Use of technology in the service as part of the specification discussions but including the capacity to have virtual permits

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 **Data Quality**

|  |  |  |
| --- | --- | --- |
| 1 | Poor |  |
| 2 | Sufficient | x |
| 3 | High |  |