

Retention of Scratch Cards: Summary of Deputation from the Belsize Society and Age UK

Reason for Deputation to this Cabinet Meeting

1. The Cabinet is deciding on revisions to its Parking Policy. Paragraph 2.32 proposes that scratch-card visitor permits are removed for the majority of customers. Paragraph 2.33 proposes that scratch-cards are retained for “Assisted Customers, or those customers who are registered by Contact Camden as digitally excluded”. These residents would need to call Contact Camden to pre-book/ book visitor parking, including out of hours, via the use of an Integrated Voice Recognition (IVR) telephone service.
2. The request to retain scratch-cards is backed by organisations across Camden including: WHAT - West Hampstead Amenity & Transport, Camden’s Older People’s Action Group, Castlehaven CC, Queens Crescent CA, Visually Impaired in Camden, CRASH - Community Residents Active in South Hampstead, Kentish Town CC, Netherhall Neighbourhood Association, Kilburn Older Voices Exchange (KOVE), Somers Town CA, Redington Froggnal Association, West Kentish Town Estate TRA, Webheath TRA, MILAM RA, Community Association West Hampstead, Abbey CA, Sidings CC.

Main request- Retain Scratch-cards

3. **We are asking the Cabinet to reconsider this proposal, and retain scratch-card visitor parking, both for current users and for those Camden residents who need them because they would be adversely impacted by the digital approach or the proposed non digital options.**
4. **We believe that the removal of scratch-card visitor parking will disadvantage a significantly higher number of residents with characteristics that are protected under Equalities legislation than will be included in the proposed “Assisted Customer” scheme.**
5. There is no information provided in the Cabinet Paper about the number of residents who are currently “Assisted Customers, or those registered by Contact Camden as digitally excluded”, but the figure of 200 was mentioned at the Full Council meeting last month.
6. ***The Equality Impact Assessment (EIA) does not detail the numbers likely to be affected by the proposal, but all the figures available suggest that it is substantially higher than 200.***
 - Census data from 2021 shows that Camden has more than 11,000 residents aged 75 and over, more than 30,000 living with a disability or long term condition that limited their day to day activities, many people who live alone and around one in seven of the population defined as income deprived. According to Ofcom 60% of those aged 70+, living alone and with an impacting or limiting condition did not use the internet or have access to it at home. ***It would be very surprising if Camden’s profile was substantially different from this.***
 - The Census 2021 data contained in The State of the Borough report, states that 3.2% of the population of Camden and Barnet is digitally excluded – which for Camden would be over 6,700 residents. ***This number is substantially higher than the apparent number of residents who are registered as digitally excluded with Contact Camden or are in the Assisted Customer category.***
 - At the Council meeting on January 29th we were told that there are 2,200 users – 863 of whom are 75+ and 98 with disabilities who are ‘registered’ with Camden.
6. **We believe that the proposed mitigations are impractical in terms of addressing the difficulties outlined by members of the Belsize Society and others who have been in touch with us. These difficulties include visual and hearing difficulties, as well as basic lack of access or ability to use digital devices.**
 - Countless members have told us of their difficulties ***using mobile phones*** (including smart phones) as well as simply ***lacking access to digital devices.***
 - The ***telephone option for access to digital visitor permits*** would still require a Camden account.
 - The option allowing people ***to nominate a person*** who could purchase Visitor permits on the online system for them is wholly impractical for most circumstances in which they are needed– e.g. situations where that person

cannot be reached at the appropriate times - including when parking session start and finish times need to be amended.

- The option of **registering as an Assisted Customer and/or as a digitally excluded resident** requires processes that may well be difficult if not impossible for many residents – who will either not understand the process or be aware of the option in the first place. It is also not at all clear what the criteria for inclusion would be and, crucially, how these would be measured against Equalities legislation.

8. There is no assessment of the need for scratch cards for people requiring carers, or for carers themselves. A number of London Councils make specific provisions for paper vouchers for carers. The difficulties caused by abolition of scratch cards is illustrated by resident who says:

I have responsibility for an old lady with advanced Alzheimer's. The live-in carers have been instructed by the care agency that they are not to get involved with the e-visitor system. They should not download the parking app or get involved with phoning to organise a permit. 'That is not their job.' I am at my wit's end trying to figure out how I am going to manage the many health visitors, tradesmen, and friends who come by on a weekly basis.

If the Cabinet refuse the main request, we ask that the decision is delayed, in order to allow consultation with community organisations and the completion of a full Equalities Impact Assessment.

9. The timetable for introducing these changes to visitor parking is June/July, following a formal "Notice of Proposal" in early May. With London election purdah that would give only a few weeks to communicate with existing scratch-card users about the new arrangements. **Implementation on this timetable would be likely to mean many people were unaware of or unable to navigate the new systems and thereby prevented from having visitors at all.**

10. We would propose that the Council delays the decision until the Autumn, and uses the summer to consult with relevant community organisations, including those included in this deputation and those specifically representing older people, people with disabilities and carers. Age UK Camden chairs the Camden Older People's Action Group, and has specifically offered to facilitate consultation and consumer feedback, building on the work they have previously done with Camden Connect to improve the accessibility of the Council's switchboard.

11. Consultation and engagement with such groups would enable the Council to understand how people would find out about and apply for the Assisted Customer scheme, and to test and learn whether the proposed telephone, IVR and other options would be accessible to those who were not considered to be eligible for the scheme. It would also open up the possibility of alternative or additional solutions offering better user access.

12. Finally, a delay would also allow a full and more focused Equalities Impact Assessment to be carried out, based on appropriate sources of data on the different ways in which the new policy would impact all vulnerable groups – including but not solely those facing digital exclusion.