

# Parking for Children / Young People With Cancer

Reference Number: F4958 Date of Response: 19/10/2022

Further to your Freedom of Information Act request, please find the Trust's response, in **blue bold text** below:

# Royal Devon's Eastern FOI Office Response

- 1. A copy of the Trust's parking policy. Please find attached.
- 2. Details of the price of car parking per hospital site within the Trust.

Up to 1 Hour: £1.50
Up to 2 Hours: £2.50
Up to 3 Hours: £3.50
Up to 4 Hours: £4.50
Up to 5 Hours: £5.50
Up to 6 Hours: £6.50
Up to 7 Hours: £7.50
7-24 Hours: £12.50
Weekly ticket: £26

- 3. Confirmation of how the Trust has implemented both the mandatory and voluntary elements of the "NHS car parking guidance 2022 for NHS trusts and NHS foundation trusts", including;
  - a. whether parents and/or carers of children and young people (up to age 25) with cancer are offered free parking/parking exemptions.
     Yes
  - b. whether parents and/or carers of children and young people (up to age 25) with cancer are offered parking concessions and details of the financial value of these.

Carers and parents with children in hospital overnight: may register with the children's ward for free parking.

For patients visiting on a regular basis for treatment i.e. Oncology, Haematology, Renal and Diabetes departments: Vehicle registrations can be added to an exemption list.

- c. whether young people (17-25) with cancer are offered free parking/parking exemptions. Please see response to question 3 b.
- d. whether young people (17-25) with cancer are offered parking concessions and details of the financial value of these.
   Please see response to question 3 b.

- e. whether any free parking/parking exemptions or concessions apply to inpatient/active treatment visits, visits to attend follow-up appointments(i.e. not undergoing active treatment), or both.

  Free parking is given to a patient admitted to a ward from the Emergency Department. Free parking is given to a carer of an inpatient when attending the ward/department.
- 4. If yes to any items in point 3, how many parents and/or carers of children and young people (up to age 25) with cancer and/or young people (17-25) with cancer have been offered free parking/parking exemptions or concessions, provided per category (free parking/exemption, concession);
  - a. per financial year since 2017 (2017/18, 2018/19, 2019/20, 2020/21, 2021/22, and 2022/23 to date)
  - b. per hospital site within the Trust.
     The data requested in question 4 a, and b, Is not data that is captured/available on Trust systems. As such the Trust is unable to respond to these questions.
- Details of how the Trust shares, communicates and displays information about free parking/parking exemptions and/or concessions, their eligibility, how to access them and their financial value.
   Details are available on the Trust's website, and communicated via appointment letters.
- 6. Confirmation whether car parking within the Trust is owned and managed by the Trust or is owned and managed by a private company, and if so what company.
  - Car parking is owned by the Trust who employ a company to carry out enforcement within the car parks and is APCOA Park Ltd.
- 7. Details of how many complaints the Trust has received from parents and/or carers of children and young people (up to age 25) with cancer and/or young people (17-25) with cancer regarding car parking charges or regarding the information the Trust provides about car parking charges;
  - a. per financial year since 2017 (2017/18, 2018/19, 2019/20, 2020/21, 2021/22, and 2022/23 to date)
  - b. per hospital site within the NHS Trust or NHS Foundation Trust
    The data requested in question 7 a, and b is not data that is
    captured on Trust systems. As such the Trust is unable to
    respond to these questions.



- 8. Details of any other travel-related support provided by the Trust which is available to parents and/or carers of children and young people (up to age 25) with cancer and/or young people with cancer, including;
  - a. how children and young people and their parents or carers are informed of the support that is available to them.
     Information is available via the Trust's website and included in appointment letters.
  - b. how the support is accessed/applied for.This is provided via the department on attendance.
  - the financial value of the support and whether this is provided up-front or requires a claim to be paid back to the recipient.
     Details of parking concessions to these groups are given in question 3 b.
  - d. the duration of the support and type of care this applies to
     (e.g. inpatient/active treatment, follow-up/outpatient etc.)
     In-patient/active treatment for this age group and out-patient
     appointments when attending for treatment.



# Royal Devon University Healthcare

**NHS Foundation Trust** 

Extension granted by Chair of OB 21/01/2022, expiry date now January 2023

Car Parking Policy (Eastern Services)			
Post holder responsible for Procedural Document	Alison Knowlton, Security, Portering, Access Control & Car Parking Operations Manager		
Author of Policy	Alison Knowlton, Security, Portering, Access Control & Car Parking Operations Manager		
Division/Department responsible for Procedural Document	Operations Support Unit		
Contact details:	×		
Date of original document:	June 2011		
Impact Assessment Performed	Yes/No		
Ratifying body and date ratified:	Hospital Operations Board:		
Review date and (frequency of further reviews):	April 2018 (every 2 ½ years)		
Expiry date	October 2018		
Date document becomes live:	October 2015		

Please *specify* standard/criterion numbers and tick ✓ other boxes as appropriate

Monitoring Information	Strategic Directions – Key Milestones	
Patient Experience	Waiting	
Assurance Framework	Privacy and Dignity	
Monitor/Finance/Performance	Efficiency and Effectiveness	
COC Fundamental Standards, Deculation 15	Delivery of Care Closer to Home	
CQC Fundamental Standards: Regulation 15	Infection Control	
Other (please specify):		
Note: This policy has been assessed for any equality, diversity or human rights implications		

### **Controlled document**

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Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January 2023 Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 1 of 26



Full I	History		Status: Final	
Version	Date	Author (Title not name)	Reason	
1.0	01/06/2011	Security, Portering, Access Control & Car Parking Operations Manager	New Policy	
2.0	13/ 09 /2012	Security, Portering, Access Control & Car Parking Operations Manager		
3.0	Dec 2014	Security, Portering, Access Control & Car Parking Operations Manager	Minor amendments	

Associated Policies:	Disciplinary and Appeals Policy	
	Violence & Aggression Policy	
	Sustainable Development Management Plan: 2009 to 2015	

## In consultation with and date:

General Manager Operations Support Unit:- 09 June 2015

Trust Staff Travel Group :- 09 June 2015 Governance Manager:- 09 June 2015 Divisional Directors:- 09 June 2015

Assistant Directors Nursing:- 09 June 2015 Patient Experience Committee:- 09 June 2015

Equality and Diversity: 09 June 2015

PEP:- September 2015 JSCNC:- 10 September 2015

HOB:- to ratify date (16 October 2015)

Review Date (Within 3 years)	April 2018
Contact for Review:	Security, Portering, Access Control & Car Parking Operations Manager
Executive Lead Signature: (Only applicable for Strategies & Policies)	

Review date: April 2018 Page 2 of 26

# **CONTENTS**

1.	INTRODUCTION	4
2.	PURPOSE	4
3.	DEFINITIONS	5
4.	ROLES AND RESPONSIBILITIES OF STAFF	5
5.	PERMIT TYPES	6
6.	ELIGIBILITY CRITERIA FOR FULL ON-SITE PARKING PERMIT	6
7.	ELIGIBILITY FOR SPECIALIST PARKING	7
8.	ELIGIBILITY FOR VOLUNTEER PERMITS	8
9.	PARKING PERMIT APPEALS	8
10.	GENERAL PERMIT CONDITIONS	8
11.	PERMIT ENFORCEMENT	11
12.	PATIENT & VISITOR PARKING	11
13.	BLUE BADGE SCHEME PARKING	12
14.	MOTORCYCLE / QUAD BIKE PARKING	13
15.	CONTRACTORS, ENGINEERS, COURIERS	13
16.	EMERGENCY VEHICLES	14
17.	AMBULANCE AND VOLUNTARY CAR SERVICE DRIVERS	14
18.	ENFORCEMENT OF TRUST PARKING REGULATIONS	14
19.	ABANDONED VEHICLES	15
20.	PARKING CHARGE NOTICES	15
21.	PARKING CHARGE NOTICE PAYMENTS	15
22.	DISCOUNT AND INCENTIVES FOR EARLY PAYMENT OF PARKING CHARGE NOTICES	
23.	OUTSTANDING NOTICES	16
24.	DISPUTE RESOLUTION	16
25.	THE CAR PARKING APPEALS PANEL GUIDE	17
26.	VERBAL AND PHYSICAL ABUSE	17
27.	DISCLAIMER	17
28.	ARCHIVING ARRANGEMENTS	17
29.	PROCESS FOR MONITORING COMPLIANCE WITH AND EFFECTIVENESS OF THE POLICY	
30.	REFERENCES	18
31.	ASSOCIATED TRUST POLICIES	18
APPE	NDIX 1: CAR PARKING TARIFFS	
APPE	NDIX 2: THE CAR PARKING APPEALS PANEL: TERMS OF REFERENCE	20
APPE	NDIX 3: COMMUNICATION PLAN	23
	NDIX 4: RAPID IMPACT ASSESSMENT SCREENING FORM ERROR! BOOKMADEFINED.	RK

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January

Ratified by: *Hospital Operations Board* 16 October 2015 Review date: *April 2018* 

#### 1. INTRODUCTION

- 1.1 Effective management of car parking is vital if control is to be maintained over the restricted number of car parking spaces and internal carriageways on Trust sites. Parking schemes operate within the Royal Devon and Exeter NHS Foundation Trust (hereafter referred to as 'the Trust') in order to manage the limited parking facilities available to patients, visitors and staff, and ensure ease of access for emergency and service vehicles. This policy conforms to the operational objectives set out in <a href="Sustainable Development Management Plan: 2009 to 2015">Sustainable Development Management Plan: 2009 to 2015</a> agreed by the Trust Board. December 09.
- 1.2 As part of the <u>Trust Green Travel Plan</u>, efforts are being made to:
  - Address congestion around Trust sites
  - Reduce carbon and other pollutants
  - Improve parking access for patients and other essential users
  - Encourage a healthy workforce

These will be achieved by trying to reduce commuting traffic to Trust sites. As a result, the Trust encourages staff and visitors to consider alternatives to using cars when travelling to the hospital, including:

- Walking
- Cycling
- Car sharing
- Public transport
- Dedicated Park and Ride
- 1.3 Revenue raised is used to fund transport initiatives aimed at encouraging reduced single-occupancy car usage wherever possible and promoting active lifestyles.
- 1.4 All land owned by the Trust and Devon Partnership NHS Trust (DPT) is included within the Trust enforcement area.
- 1.5 The Trust car parking enforcement service is contracted out to an external provider. This British Parking Association approved provider provides the DPT with enforcement services through the Trust contract. The Trust property is classed as Private Land and therefore is outside Exeter City Council parking enforcement area.
- 1.6 Failure to comply with this policy could result in disciplinary action.

# 2. PURPOSE

- 2.1 The purpose of this policy is to address limited car parking space and traffic management issues within the hospital and covers the arrangements for the following:
  - Staff Users and volunteers
  - Patients and visitors
  - Those visiting the Trust property on business

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January 2023

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 4 of 26

- 2.2 The policy aim is to provide appropriate, adequate and accessible parking for patients, staff and visitors, within space restrictions as defined by Local Planning Authorities.
- 2.3 All known incidents of non-compliance will be entered on Datix to be followed up by department managers in line with the Disciplinary and Appeals Policy.

#### 3. **DEFINITIONS**

3.1 For the purposes of this policy only, Staff Users are defined as staff of the Trust, together with any other persons employed by the Trust or outside agencies that are required to work on RD&E sites.

#### 4. ROLES AND RESPONSIBILITIES OF STAFF

- 4.1 **Chief Executive** has overall responsibility for ensuring the implementation of this policy throughout the Trust.
- 4.2 **Director of Finance** has responsibility for the final approval of permit charges
- 4.3 **General Manager, Operations Support Unit** has delegated responsibility from the Chief Executive for the implementation of this policy. The day to day implementation and monitoring of the policy is delegated to the Head of Facilities Management. The General Manager will review the permit charges annually.
- 4.4 **Head of Facilities Manager** oversees the management of the car parking facility in accordance with the policy.

# 4.5 **Security, Portering, Access Control & Car Parking Manager**

The Security, Portering, Access Control & Car Parking Manager is responsible for carrying out the day to day management of car parking facilities in accordance with this Policy.

Prevention of unauthorised parking is through a contracted enforcement provider.

#### 4.6 Car Parking Enforcement Officer

- Will issue PCNs to vehicle causing obstruction to roads and pathways.
- Will issue PCNs to vehicles not parking in designated parking areas.
- Ensure that on-site parking is by the use of either permit or pay and display.

#### 4.7 Car Parking Department Staff

To manage staff parking in a way that encourages staff to use alternative modes of transport other than single occupancy vehicles. Changes to staff user and voluntary permit entitlement will be implemented on a rolling basis as existing permits are due for renewal or at the direction of the General Manager, Operations Support Unit. New applications will be processed under the terms of this policy. The Car Parking Department reserve the right to provide permits on an alternative basis should service demand.

### 4.8 All Staff

Staff Users have a personal responsibility to familiarise themselves and comply with this policy. Parking on Trust Land constitutes acceptance of the Trust car parking terms which are clearly displayed at all vehicle entry points. A copy of this policy is retained for inspection by any member of staff at Main Entrance Reception. Failure to

comply with policy will result in disciplinary action. All incidents will be recorded and departmental managers will be responsible for investigation under the relevant policy.

# 4.9 Trust Travel Group

The Trust Travel Group will review the parking policy, charges and complaints.

#### 4.10 The Trust Appeals Panel

The Trust appeals panel will hear weekly appeals from recipients of a parking charge notice who feel it may have been issued incorrectly.

#### 5. PERMIT TYPES

- 5.1 There are ten types of permit in operation at the Trust:
  - Priority
  - Priority pay by day
  - Transient
  - Ordinary
  - Park & Ride Can be used on main site 1630 0830 hours daily & all weekend and bank holidays
  - Travel Scheme 1830 0800 hours daily including weekends and bank holidays between these hours
  - Residential Residential area only
  - Temporary/Volunteer
  - Car share permit
  - Holiday Play Scheme
- 5.2 Only original Car Parking Department approved permits are acceptable on site; use of an unauthorised permit, note or sign will result in a Parking Charge Notice (PCN) being issued.

#### 6. ELIGIBILITY CRITERIA FOR FULL ON-SITE PARKING PERMIT

6.1 No permit will be issued to a member of staff with a residence within 1.5 miles from the Wonford site or the specific site for which they are applying for a pass. The only exception to this will be personnel who have children attending the Trust nursery, blue badge holders, transient, priority users and holiday play scheme.

Consideration may also be given for on-site parking at the discretion of the General Manager, Operations Support Unit, if an application has been supported at Divisional Directorate level, for those staff not eligible for on-site parking but whose role regularly requires them to work across different sites or outside of normal working hours and who would previously have had access to Departmental parking permits. This excludes those staff whose off site commitments must be evidenced by their mileage claims.

- 6.2 All staff, whose core hours fall within the Park and Ride operating times 06:40 and 22:15, Monday to Friday, will automatically be issued with a Park and Ride permit unless qualifying for an Ordinary permit under the following points based criteria:
- 6.3 Below is the point system under which you may qualify. You must gain 4 points or more and evidence of any mileage must be provided at the time of application.

- 4 Points: Where a user's contract defines them as a Regular or Essential user, (>3500 miles per year or 1250 miles per year and use their vehicle on average three days per week or spend at least 50% of their time on such travel).
- 4 Points: Where a user requires the use of their vehicle for off-site commitments on average three days per week or spends at least 50% of their time on such travel. Part-time staff will be assessed on a pro rata basis; evidence of this must be supplied.
- 3 Points: Applicants who live 10 miles and over from the Wonford site.
- 2 Points: Applicants who are deemed to require occasional use of a car during the course of their duties. Occasional use should be at least once weekly. Evidence of this must be supplied at the time of application by production of the previous six months' mileage claims. This will delay the issue of the permit if not given at the time of the application
- 2 Points: Applicants who live in 5 miles and over but less than 10 miles from Wonford site or the site for which they are applying for a pass.
- 1 Point: Applicants who live in excess of 1.5 miles but less than 5 miles from the Wonford site or the site for which they are applying for a pass.
- 1 Point: This applies to those staff who have responsibility for dependent or family members due to circumstances which deem them likely to have to leave site immediately i.e. medical/mental health reasons. This does not apply to all employees of pre and school age children. This application must be supported by their Cluster Manager / Service Manager / Senior Nurse along with a declaration that the individual's hours of work cannot be flexibly adjusted to fit Park and Ride timings. Each application on these grounds will be submitted to the Trust Appeal's Panel for consideration.
- In order to assist staff during periods of particular hardship or impairment, a temporary Ordinary pass may be issued to individuals on a pro rata payment basis for up to 2 months. The appellant's Cluster Manager / Service Manager/Senior Nurse must support the application in writing to the Appeals Panel. Renewal will not be automatic and a maximum of three renewals will be permitted.
- Applicants not qualifying for a full on-site car parking permit but wishing to receive information on alternatives e.g. discounted Stagecoach bus travel, the Trust Park and Ride service (PR3), <a href="Carsharedevon.com">Carsharedevon.com</a> Trust Car Share Scheme or access controlled bicycle parking should contact the Car Parking Department on ext. 2358. All exclusions will be periodically reviewed and may be subject to change.
- 6.6 Where the Car Parking department has evidence of limited public transport or available non subsidised Trust Park & Ride facilities, consideration may be given to provide an onsite permit.

# 7. ELIGIBILITY FOR SPECIALIST PARKING

7.1 The following staff groups meet the eligibility criteria for Priority and Transient permits:

- Priority Directors, Divisional Directors /General Manager, Consultants and other users who meet the required criteria, as defined in the <u>car parking permit</u> application form, due to operational duties.
- Transient Designated Regular and Essential users or where a user requires the
  use of their vehicle for offsite commitments as defined in the <u>car parking permit</u>
  <u>application form</u>. On average these commitments should require the use of a
  vehicle at least three times per week. Evidence of mileage claims for offsite
  commitments will be required on application. Part time workers will be assessed
  on a pro rata basis. The cost of a Transient permit is equal to that of an Ordinary
  permit.
- Visiting consultants will receive free parking for a maximum of three full days (six half days) per year whilst carrying out Trust business. Clearance of the vehicle must be requested through the car parking department via the <a href="Vehicle Clearance form">Vehicle Clearance form</a> which can be found on the Trust intranet system. A Pay by Day permit may be used for further periods after this initial free parking time has expired.

#### 8. ELIGIBILITY FOR VOLUNTEER PERMITS

8.1 Volunteers who meet the criteria for an on-site permit will be granted access to the Transient, Priority and Car Park B near the main entrance of the hospital. Please contact the Car Parking Department regarding eligibility via telephone 01392 402358 or via email rde-tr.Carparking@nhs.net All other Volunteers will be offered a Park & Ride permit. All Volunteer permits are provided free of charge. Staff who volunteer are not entitled to a volunteer permit.

#### 9. PARKING PERMIT APPEALS

- 9.1 An appeal against a decision not to issue any form of permit should be made to the Car Parking Appeal Panel. The employee must lodge an appeal in writing giving full and specific details of the reasons for the appeal. Any appeal must be supported by Head of Department/Line Manager.
- 9.2 The Panel will consult with the staff member's Head of Department/Line Manager and other sources as required for additional information in relation to the appeal if they feel it is necessary to do so.
- 9.3 If an appeal is rejected and a staff member wishes to pursue a second and final appeal, evidence from the staff member's Head of Department/Line Manager must accompany the second appeal stating that the employee's working hours cannot be changed to accommodate their needs and evidence must be given of what the Division has done to try and enable the use of the Park & Ride service and why this has not been suitable for the applicant to use. The second panel should contain at least two different members than the original appeal panel. The second panel's decision will be final.

#### 10. GENERAL PERMIT CONDITIONS

- 10.1 Staff Users may apply for a parking permit for which there is a charge.
- 10.2 All staff users parking on site or using the Park & Ride service must have an appropriate car parking permit which must be issued through the car parking

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018

department, in accordance with the terms and conditions of the permit scheme, as detailed in the <u>permit information sheet</u>. The Car Parking Management Team maintains the right to issue on-site permits to any vehicle user where there is evidence of exceptional circumstances. In cases of disability or limited mobility where evidence of necessity to park on site is provided the staff member may appeal to the Trust Appeal's Panel who may provide a permit as a reasonable adjustment for disability.

- 10.3 Application forms, which are not fully and correctly completed, will be returned, thereby delaying the issue of a permit. Parking on site prior to receipt of a permit is by pay and display only.
- 10.4 The purchase/possession of a parking permit does not guarantee a parking space on hospital sites. All car parking permits remain the property of the Trust and the abuse of privilege or unauthorised photocopying or alteration of the permit, in any way, may constitute an offence of fraud. Any such identified offence may result in disciplinary and/or criminal proceedings being pursued.
- 10.5 The public Pay & Display facilities must not be used as an overspill car park. If the staff car parks are busy then staff using 'pay and display' must purchase a ticket and comply with appropriate tariff for the length of stay required. A parking permit will not exempt staff from pay and display charges. In exceptional circumstances a Priority Permit holder may park in any space available on site.
- 10.6 Collection or acceptance of a permit signifies acceptance of the full terms of the Car Parking Policy.
- 10.7 Should a member of staff change their vehicle or the registration number of their vehicle, the car parking department must be notified immediately. A replacement permit will be issued confirming the new details, free of charge. The old parking permit must be returned to the car parking department in exchange for the replacement permit.
- 10.8 It is the responsibility of the permit holder to ensure that permits are kept safe. Should a permit be lost, you will be charged an administration fee for the issue of a replacement permit. All details of the lost permit will be cancelled rendering the permit invalid and the permit details will be passed to the Trust Enforcement Officer.
- 10.9 A member of staff holding a parking permit who moves to reside within city boundaries and where there is no evidence of limited public transport, will be requested to surrender any parking permit they hold. Individual cases will be subject to on-going review.
- 10.10 Staff choosing to live on site will also be expected to apply for a parking permit and will be charged the monthly/annual fee.
- 10.11 Permit charges are reviewed annually or as required by the General Manager, OSU and final approval by the Director of Finance.
- 10.12 It is the responsibility of all permit holders to apply for the renewal of their permits. Non receipt of the renewal form (Car Parking Permit Application form) will not be accepted as a reason for non-renewal.

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 9 of 26

- 10.13 It is the responsibility of the permit holder to ensure that the permit is clearly displayed on the dashboard or in the front windscreen of the vehicle at all times to demonstrate eligibility.
- 10.14 Trust employees may pay for parking permits by deduction from salary on an annual or monthly basis. Bank workers and other applicants must make a full payment by cash or card payment at the General Office, main concourse. Trust employees who are eligible to participate in the <a href="Salary Sacrifice Scheme">Salary Sacrifice Scheme</a> must pay by monthly deduction from salary.
- 10.15 All staff may park free of charge in a designated staff car park between the hours of 1830 and 0800 Monday to Sunday provided that a Trust Travel Scheme Permit is displayed clearly in the window. Travel Scheme Permits may be purchased from the Car Parking Department. Failure to display a Trust Travel Scheme Permit will result in a PCN being issued.
- 10.16 Staff who forget to display but are in possession of a valid permit may contact the Car Parking Department on up to 5 occasions within a twelve month period to ask for the car to be cleared for 24 hours. Contact must be made with the Car Parking Department on arrival via the <a href="Vehicle Clearance form">Vehicle Clearance form</a> which can be found on the Trust's intranet site. If a PCN is issued after the form is received by the Car Parking Department, the Appeals panel will waive the ticket. If the vehicle clearance form is received after a PCN is issued, the PCN will stand.
- 10.17 Staff are not permitted to park in areas designated for Patients and Visitors without complying with the appropriate Pay & Display tariff payment. Any alteration of Pay and Display tickets or abuse of the regulations may lead to disciplinary action being taken.
- 10.18 Only one permit will be issued to a member of staff or volunteer and is only to be used by that individual during the course of their duty. However, those who own one or more vehicles will be able to register up to two cars on a single permit. The permit must be displayed on the vehicle in use.
- 10.19 Parking is not allowed in marked disabled bays, at any time, unless a valid Blue Badge, issued by local authorities under the Blue Badge Scheme, is correctly displayed. Abuse of the Blue Badge scheme will be reported to the authorities. A PCN will be issued for inappropriately parking in a Blue Badge area. Abuse of the Blue Badge Scheme will be reported to the relevant authorities.
- 10.20 Day to day problems or advice regarding car parking should be referred to the Trust's car parking management team on 01392 402358. Alternatively, the team can be contacted on the car parking group email account under <a href="mailto:rde-tr.Carparking@nhs.net">rde-tr.Carparking@nhs.net</a> The department is also able to answer questions regarding the Park & Ride service, site cycle parking, Car Share and discounted bus travel.
- 10.21 The car parking office is open for personal enquiries 08:00 -16:30 hours Monday Friday. Outside these hours, staff users may email, leave a voicemail or in the event of an incident involving a vehicle, contact the site security team on extension 2381.
- 10.22 Weekly and daily tickets may be purchased from the General Office, this is available for visitors and patients only, also see <a href="Section 12 Patient & Visitors Parking">Section 12 Patient & Visitors Parking</a> which outlines patients exempt from car parking charges.

10.23 Staff with irregular off site commitments and who are eligible to use the Vehicle Clearance Form on the Trust's intranet site must ensure that their Departmental Budget Number is indicated on the form. Clearance cannot be authorised without this. A charge of £6 per clearance will be given for each request.

#### 11. PERMIT ENFORCEMENT

- 11.1 It is recognised that the vast majority of staff use valid parking permits whilst parking on site, and have no intention of abusing the permit system. This section is intended to protect those staff and minimise any opportunity of fraud occurring, as the Trust is determined to prevent any instances of fraudulent behaviour.
- 11.2 Permits are only valid in the car park/area for which issued. Vehicles found displaying an incorrect permit for the area where parked on 3 occasions will result in the removal of the permit.
- 11.3 Vehicles parked in a designated staff parking area without displaying the appropriate permit will be subject to a PCN.
- 11.4 Valid permits must be fully and clearly displayed at all times on, or visible through the front windscreen/dashboard. Notes or instruction to the parking attendant will not be accepted and may result in a PCN being issued.
- 11.5 Abuse of the permit system may result in that individual having their parking permit privileges withdrawn and may lead to disciplinary action being taken. Abuse of the permit system may also lead to a PCN being issued. Abuse of the Parking Permit system will be reported to NHS Protect (Counter Fraud Service) for investigation. All instances where a member of staff has allowed another person the use of their permit at the same time will result in the incident being reported as fraud and entitlement withdrawn for a period up to 6 months.
- 11.6 Permits must not be altered or reproduced in any way. Anyone found contravening this instruction will be issued with a PCN. Parking privileges may be withdrawn and disciplinary action taken. All incidents of unauthorised alteration or reproduction of parking permits will be reported to the NHS Protect (Counter Fraud Service).
- 11.7 On evidence of repeated issuing of PCN's to a staff member, this may lead to disciplinary action for failure to adhere to Trust policy.

## 12. PATIENT & VISITOR PARKING

- 12.1 Where practicable, all Patient & Visitor car parks are located as close to the hospital as possible.
- 12.2 A Pay and Display system is in operation and requires non permit holders to pay for parking and to display a valid ticket for the length of stay required. The ticket should be placed face up on the dashboard inside the vehicle, be clearly visible to the Enforcement Officer and valid for the period which the driver/registered keeper remains in a parking space on site. Pay and Display machines are located in all Pay and Display car parks. The system of pay and display operates from 0830 to 2030, Monday to Sunday inclusive.

- 12.3 Should a Pay and Display machine be out of order, a ticket must be obtained from the next nearest machine. If a machine is found to be out of order it should be reported to the main reception desk at the site where the car park is located.
- 12.4 The scale of charges is clearly displayed on boards adjacent to each ticket machine and is detailed at Appendix 1

Weekly tickets are available but are for visitors only. Weekly tickets may be purchased from the General Office, in the main RD&E Wonford entrance.

Payment by card will incur an administration charge per transaction.

- 12.5 The Car parking department is unable to offer refunds for tickets purchased.
- 12.6 Some patients may be exempt from pay & display charges. The Trust provides free parking for patients attending the Wonford and Heavitree sites for regular treatment within the following departments:
  - Cancer Services
  - Haematology
  - Renal Dialysis
  - Paediatric Oncology
  - Neonatal Unit
  - Diabetes
  - Patients admitted directly from Emergency Department or Clinics
  - Next of kin with long stay relatives at the discretion of the Security, Portering, Access Control & Car Parking Manager
  - Disabled badge holders exempt from charges in accordance with <u>paragraph 13.1</u>
- 12.7 Official passes are issued by each department. In addition to this list, free parking is given to parents and carers who are resident at the hospital as a result of their children being inpatients or who have individual requirements warranting special consideration. The Car Parking Management Team maintains the right to issue on-site permits to any vehicle user where there is evidence of exceptional circumstances.
- 12.8 Under no circumstances are members of staff to use patient permits. Staff found using these permits or designated spaces will be issued with a PCN. Disciplinary action may be taken and abuses reported to the NHS Protect (Counter Fraud Service).
- 12.9 Vehicles parked in contravention of the site regulations will be subject to a PCN.

# 13. BLUE BADGE SCHEME PARKING

- 13.1 The Trust recognises the Blue Badge Scheme and provides parking, for Blue Badge holders, free of charge.
- 13.2 Parking bays for Blue Badge holders are provided as close as possible to building entrances. Blue Badge holders may also park in Car Park C (adjacent to the Oncology department) and in any Pay and Display car park free of charge, providing their badge is clearly displayed in accordance with the conditions of the Blue Badge Scheme.

- 13.3 When parking on site, all conditions of the Blue Badge Scheme, as to where vehicles can and cannot be parked, must be adhered to. If causing an obstruction, hindering, the access of emergency vehicles it will be subject to a PCN being issued.
- 13.4 Misuse of the Blue Badge is a serious offence and will be reported to the appropriate authorities. Fraudulent use by staff members may lead to a disciplinary procedure.
- 13.5 Vehicles parked in contravention of the site regulations will be subject to a PCN being issued.
- 13.6 On parking in the blue badge designated car parking spaces at the Wonford Hospital main entrance a ticket must be obtained from the ticket machine located at the entrance to this area. No fee will be required to park. This ticket will enable a blue badge holder to park for 2 hours with no return within 4 hours. Alternative parking continues to remain free of charge to blue badge holders in any pay and display car park with no time limit with their blue badge displayed on the dashboard of the vehicle.

### 14. MOTORCYCLE / QUAD BIKE PARKING

- 14.1 Motorcycle parking areas are located around the hospital sites. Although parking is not restricted to these areas, motorcyclists are requested not to park in car parking spaces unless absolutely necessary. When parking in either marked or unmarked areas, or on pavements motorcyclists must not cause any obstruction for other site users.
- 14.2 Motorcyclists/quad bikes are not subject to purchasing either permit or Pay and Display tickets .
- 14.3 A motorcycle/quad bike causing an obstruction will be subject to a PCN.
- 14.4 Quad bike drivers are requested not to park in car parking spaces unless absolutely necessary.

#### 15. CONTRACTORS, ENGINEERS, COURIERS

- 15.1 Due to necessary development/building works, contractors may need to be on site for long periods. Generally, main contractors will be given compounds for the duration of the contract. Contractor vehicles parked within these compounds are the responsibility of the contractor. Any contractor parking outside of the agreed compound must comply with the site regulations regarding pay and display. Contractors staying in site accommodation may apply for a residential permit at the weekly accommodation rate. The number of contractor vehicles within the compound will be at the discretion of the Security, Portering, Access Control & Car Parking Manager.
- 15.2 Contractors working on site on short-term maintenance work must comply with the Car Parking and Estates department regulations and display an estates issued pass. Contractor vehicles must be parked in an authorised parking bay. When parking on site contractors must park taking due consideration for other site users. The number of Estates passes will be limited and contractor vehicles without a pass are required to park off site. Any contractor vehicle found parked on site without an Estates pass will be liable to a PCN. Parking of contractor vehicles in loading bay areas is not permitted. Any vehicle found in this area may be liable to a PCN. At all times contractors must

- adhere to any instructions from the Security, Portering, Access Control & Car Parking Manager or their representative.
- 15.3 Service Engineers will generally be allowed to park close to the area in which they are working unless it is deemed by the Security, Portering, Access Control & Car Parking Manager or their representative inappropriate due to the service requirements of departments nearby. The vehicle may be permitted if they need to use their vehicle as a base/workshop. At all times engineers must adhere to any instructions from the Security, Portering, Access Control & Car Parking Manager or his representative. If a Service Engineer parks within a pay & display car park they will have to pay the appropriate tariff. Parking of service engineer vehicles is not permitted in loading bay areas. Any vehicle found in this area may be liable to a PCN. Vehicles with an unofficial note / letter displayed in the window will not be exempt from a PCN.
- 15.4 Courier and delivery vehicles may park close to their delivery point but must ensure that they do not cause obstruction to other site users, carriageways, etc. The vehicle must be moved as soon as the delivery has been made. Excessive waiting will result in a PCN being issued. Courier vehicles must be parked in an authorised parking bay. Any vehicle found in contravention of this will receive a PCN.

#### 16. EMERGENCY VEHICLES

- 16.1 It is essential that Emergency Ambulance crews remove their vehicles from the area they have stopped to deliver their patient(s) as soon as possible, in order to keep the area clear for other emergency ambulances.
- 16.2 Vehicles must be parked at all times taking into consideration the needs of all site users.
- 16.3 Ambulances must not be left in unmarked areas outside the Emergency Department or within Car Park C or the Centre for Women's Health or the hospital main entrance.
- 16.4 Police vehicles which are on routine business must use the designated police parking spaces.

## 17. AMBULANCE AND VOLUNTARY CAR SERVICE DRIVERS

17.1 Whilst it is expected that drivers will need to drop their passengers off as close to the building as possible, they must then move their vehicle to the ambulance area at the front of the main building for the purpose of escorting the patient to the appointment. For periods of waiting the vehicle must be moved from the hatched area to a parking space within the allocated car parks. Entrances to the hospital must be kept clear for emergency services, drop off and pick up and through traffic. Ambulance and voluntary car service drivers will not be issued with an RDEFT pass. All drivers' vehicles should display the South West Ambulance Service Transport parking permit clearly in the front window of the vehicle.

#### 18. ENFORCEMENT OF TRUST PARKING REGULATIONS

18.1 Trust sites are private land and as such any vehicle's driver or keeper who enters the site agrees to abide by the Trust parking regulations which are displayed at all entrances. If vehicles park they agree to pay.

Page 14 of 26

Car Parking Policy - Extension granted by Chair of OB 21/01/ 2022, expiry date now January 2023

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018

- 18.2 Any correspondence regarding PCNs must be made to CP Plus as detailed on the PCN and not through the Trust to avoid confusion.
- 18.3 Enforcement shall take place on sites where there is clear and adequate signage. All entry points to Trust land have warning notices displayed that outline terms and conditions of parking on the site.
- 18.4 All signs will be clear of obstructions and maintained. Whenever a Parking Charge Notice (PCN) is issued, the contracted enforcement operator will confirm that the signage was clearly visible at entry points to Trust land and reasonably on display throughout the site.
- 18.5 All signs will provide information in simple and unambiguous language with a preference for the use of recognised symbols, icons or pictures whenever possible. The Enforcement contractor shall advise on all signage issues.

#### 19. ABANDONED VEHICLES

- 19.1 Vehicles abandoned on site will be removed by the normal arrangements with the Local Authority. Any costs incurred to instigate the removal will be passed on to the registered owner/keeper.
- 19.2 Charges for parking may be raised for the duration the vehicle is left on site and the fee payable before the vehicle is released to the owner.

#### 20. PARKING CHARGE NOTICES

- 20.1 Parking Charge Notice will be issued for:-
  - Failure to display a valid unexpired ticket valid for the area parked
  - Failure to display a valid unexpired permit valid for the area parked
  - Failure to park in a designated bay
  - Failure to comply with any maximum stay limit
  - Parking so as to inconvenience others or cause an obstruction
  - Failure to park within designated lines
- 20.2 The following vehicles should not be issued with a PCN:
  - Vehicles that have paid legitimately for parking and have over stayed the paid for time should be given a grace period of 10 minutes before the application of enforcement.
  - Liveried vehicles being used for official fire, police or ambulance purposes.
  - Trust liveried vehicles unless causing obstruction or inconvenience to others.
  - Vehicles displaying a valid Blue Badge Scheme pass unless the vehicle is causing an obstruction or is non-compliant with Blue Badge scheme guidelines.

#### 21. PARKING CHARGE NOTICE PAYMENTS

21.1 Payments may be received up to 28 days after the PCN was issued, before the enforcement contractor instigates any further action.

- 21.2 Payment will be accepted by the enforcement contractor by any reasonable means and receipts will be given where requested.
- 21.3 All PCN payments should be made in full to the enforcement contractor.

# 22. DISCOUNT AND INCENTIVES FOR EARLY PAYMENT OF PARKING CHARGE NOTICES

- 22.1 A discount period will exist for early payment of a PCN within and up to 14 days from the date of when the parking notice was issued. Discounts shall be advertised on signage and PCNs. PCN discounts and terms and conditions of discount periods are to be reviewed annually or at the discretion of the General Manager, Operations Support Unit.
- 22.2 All charges advertised on signs and literature is inclusive of VAT.

#### 23. OUTSTANDING NOTICES

- 23.1 When a PCN has not been paid and no challenge has been received within the time allowed, the enforcement contractor may take further enforcement action to secure payment of the outstanding amount once the registered keeper's details have been received by the DVLA. This may include referral to a debt collection agency.
- 23.2 Staff Users or their visitors who repeatedly disregard the Trust policy will be referred to their line manager for potential disciplinary action and may have their parking privileges removed permanently without refund.
- 23.3 The Trust reserves the right to pursue unpaid PCN through civil debt recovery and may seek redress through County Court Judgment and attachments to earnings.
- 23.4 Information may be publicised regarding the Trust enforcing any County Court Judgment and its outcome.

#### 24. DISPUTE RESOLUTION

- 24.1 Where a driver or keeper disputes the issue of a PCN, the enforcement contractor will forward any correspondence to the Trust or DPT Car Parking Department if issued on their land. Where the Car Parking Operations Manager believes there is grounds for an appeal hearing the Appeal's Panel where available or Head of Facilities Management and General Manager will review the case and decide whether the PCN should stand.
- 24.2 When a dispute is received, the processing of a PCN will be suspended immediately until it has been answered. All disputes will be answered within 28 days of receipt by the enforcement contractor unless additional investigation is required.
- 24.3 Should a driver or keeper wish to dispute the decision of the appeals panel, the Trust will provide an alternative panel to consider a second appeal. The second panel should contain at least two different members than the first appeals panel. The decision of the second appeals panel will be final.

- 24.4 If a dispute is rejected, the driver or keeper will be given 14 days from notice of the decision to pay the notice before further debt collection is pursued by the contracted enforcement agent.
- 24.5 The enforcement contractor will keep documentary evidence of all disputes it receives and the action taken to resolve them. A full audit trail of all actions, whether manual or generated by a processing system, should be maintained.

#### 25. THE CAR PARKING APPEALS PANEL GUIDE

- 25.1 The Car Parking Appeals Panel will sit weekly where required or additionally as required by the Chair.
- 25.2 The panel shall adhere to the Terms of Reference in Appendix 2.

#### 26. VERBAL AND PHYSICAL ABUSE

Verbal, electronic or physical abuse from any member of staff, patient, visitor or other site user in connection with this Policy will not be tolerated and will be subject to the Trust's Violence & Aggression Policy.

# 27. DISCLAIMER

- 27.1 The Trust cannot accept responsibility for any vehicles left on Trust premises. All vehicles and contents are left entirely at the owner's risk. Under no circumstances will claims of compensation be considered. Use of Trust designated car parks is undertaken entirely at the users own risk.
- 27.2 Whilst the Trust endeavours to provide adequate car parking within local planning constraints, no member of staff, patient or visitor can be guaranteed that a space will be available. The purchase of a permit or parking ticket does not constitute a guarantee of availability, at any time.
- 27.3 From time to time building work, emergency repairs, etc. may lead to a temporary closure of a car park or restriction of spaces. The Trust will attempt to minimise any disruption to site users but will not guarantee replacement spaces.

#### 28. ARCHIVING ARRANGEMENTS

The original of this policy will remain with the author Security, Portering, Access Control & Car Parking Manager. An electronic copy will be maintained on the Trust Intranet (IaN), P – Policies – C – Car Parking. Archived copies will be stored on the Trust's 'archived policies' shared drive and will be held for 10 years.

# 29. PROCESS FOR MONITORING COMPLIANCE WITH AND EFFECTIVENESS OF THE POLICY

29.1 In order to monitor compliance with this policy, the auditable standards will be monitored as follows:

No	Minimum Requirements	Evidenced by	
1.	On-going monitoring that applications meet the specified criteria for permit issue	Checked daily on receipt of applications	
2.	On-going referral of unsuccessful applicant to alternative travel options.	Carried out daily by Car Parking Department staff by telephone or by letter following appeal.	
3.	On-going monitoring of Permit holders compliance with permit conditions	Carried out by Trust Parking Enforcement Officer	

#### 29.2 Frequency

In each financial year, the Security, Portering, Access Control & Car Parking Manager will audit Permits issued to ensure that this policy has been adhered to and a formal report will be written and presented at the Trust Staff Travel Group.

## 29.3 Undertaken by

Security, Portering, Access Control & Car Parking Manager.

#### 29.4 **Dissemination of Results**

At the Trust Staff Travel Group which is held quarterly and at Security/Car Parking/Portering Joint Management & Governance Group, held bi-monthly.

#### 29.5 Recommendations/ Action Plans

Implementation of the recommendations and action plan will be monitored by the Security/Car Parking/Portering Joint Management and Governance Group, which meets bi-monthly.

- 29.6 Any barriers to implementation will be risk assessed and added to the risk register.
- 29.7 Any changes in practice needed will be highlighted to Trust staff via the Governance Managers' cascade system and at Divisional Governance Groups.

#### 30. REFERENCES

Car Share Devon (2015). Available at: https://devon.liftshare.com/

#### 31. ASSOCIATED TRUST POLICIES

Violence & Aggression Policy

Disciplinary and Appeals Policy

Sustainable Development Management Plan: 2009 to 2015

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 18 of 26

## **APPENDIX 1: CAR PARKING TARIFFS**

# **Car Parking Tariffs**

The scale of charges is clearly displayed on boards adjacent to each ticket machine and is as follows

Drop off and pick up 20 minute free period	Free
Up to 2 hours parking	£2.50
Up to 4 hours parking	£4.50
All day parking	£8.50
Weekly parking – Visitors	£26.00 *
Parking Charge Notice	£60
Discount for payment within 14 days	£30
	0000 00001

Charging Hours 0830 – 2030 hours daily Wookly tickets may be purchased from the

Payment by card will incur an administration charge per transaction.

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 19 of 26

<sup>\*</sup> Weekly tickets are for visitors only. Weekly tickets may be purchased from the General Office, in the main RD&E Wonford entrance.

#### APPENDIX 2: THE CAR PARKING APPEALS PANEL: TERMS OF REFERENCE

# The Car Parking Appeals Panel

# **Terms of Reference**

These Terms of Reference are used as evidence for:		
Care Quality Commission Outcome numbers:	13, 17, 21	
NHSLA Risk Management Standards for Acute Trusts:		
NHSLA CNST Maternity Clinical Risk Management Standards:		
Other (please specify):		

# 1. Accountability

1.1 The Car Parking Appeals Panel reports to the Trust Staff Travel Group and the General Manager Operations Support Unit through the Facilities Management and Governance Group

# Purpose

2.1 To provide a fair and equitable decision on Parking Charge Notice (PCN) appeals from Hospital Car Park users and on appeals for on-site parking permits from members of staff.

## 3. Membership

3.1 Service Manager, Facilities (Co-chair)

Security, Portering, Access Control & Car Parking Manager, Facilities (Chair)

Department Head

Staff Side Representative

Nursing Representative

Car Parking Administrator

Trust Department Representatives

- 3.2 The membership will be reviewed annually to ensure that it best reflects the requirements of a PCN Appeals Panel within the Trust.
- 3.3 Individuals may be co-opted for specific projects

# 4. A Quorum

4.1 A quorum will consist of not less than 3 members of the panel with at least the following members present:

Service Manager or Security, Portering, Access Control & Car Parking Manager One other member

Appointed/Deputy (Car Parking Administrator)

#### 5. Procedures

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January 2023

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 20 of 26

- 5.1 The Car Parking Appeals Panel shall appoint an administrator to prepare the appeals information, keep records of all decisions made, respond back to CP Plus Ltd. advising of the panel's decision and deal with any other matters concerning the administration of the panel.
- 5.2 Any member of staff may raise an issue with the Chairperson, normally by written submission. The Chairperson will decide whether or not the issue shall be included in the panel's business.
- 5.3 All appeals will be reviewed anonymously
- A PCN issued to an individual or Department for failing to clearly display a valid permit or ticket will normally be waived on the first occasion providing that either a valid ticket is produced to cover the period of the offence or a valid permit is in existence and deductions are in force at the time of the PCN issue. All subsequent PCN's will stand.
- 5.5 The Panel will waive a PCN where it has been issued as a result of a failure of the Car Parking department to process an application efficiently. This does not apply when an application is forwarded to the car parking office to be processed after the expiry date.
- In the event of a non- renewal resulting in a PCN being issued, the PCN will stand. If the renewal application is received after the issue of a PCN and eligibility remains unchanged, then deductions will be made from the start of the month when the PCN was issued and the PCN will normally be waived.
- 5.7 Abusive or inflammatory correspondence concerning an appeal will result in the panel refusing to hear the appeal and the PCN standing. All instances of abuse will be dealt with through Divisional Directors / Cluster Managers.
- 5.8 Display of a notice or message on or around the vehicle will not be accepted as contact with the parking office and when a valid permit or ticket is not on display will result in the issue of a PCN.
- Users who are in possession of a valid permit but who fail to display the permit which results in a PCN being issued will be required to appeal the decision to CP Plus Ltd. as per the instruction on the reverse of the ticket. The Car Parking Appeals Panel will normally be expected to waive a first PCN for failure to display a valid permit under these circumstances.
- 5.10 The Car Parking Appeals Panel has responsibility for hearing requests for appeals for on-site permits that have been rejected on the grounds of insufficient criteria in accordance with the car parking policy. In cases where there is sufficient grounds to question supporting authorisation provided by Service Managers, Senior Nurses, Lead Nurses or Divisional Directors / Cluster Managers the Security, Portering, Access Control & Car Parking Manager has the discretion to refer the application to the appeals panel for a decision on final approval or rejection.

## 6. Frequency of Meetings

- 6.1 The panel will sit weekly or as required by the Chairperson.
- 6.2 Extraordinary meetings may be called at the request of the Chairperson.

# 7. Duties and Responsibilities

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 21 of 26

- 7.1 The panel has a responsibility to provide a fair, equitable and timely response to parking appeals against Parking Charge Notices. All Parking Charge Notices forwarded for consideration by CP Plus Ltd. should be considered by the panel within 30 days, provided that sufficient evidence has been submitted.
- 7.2 The Chairperson will ensure that the panel complies with the Trust Car Parking Policy.

Statutory regulations:- To be compliant with Care Quality Commission regulations:

Outcome 13, Staffing

Outcome 17, Complaints

Outcome 21, Records

- 7.3 To ensure that panel members are familiar with the Car Parking Policy and up to date with any legislation, where appropriate, that they may need to have knowledge of to undertake the role.
- Annual reports: An end of year report to be compiled detailing those statistics required as determined by the Chairperson. This report will feed in to the annual report presented to the Trust Staff Travel Group.
- 9 Monitoring: The panel is to review its effectiveness by reviewing decisions made by the panel to provide consistency and to enable reconciliation between Parking Charge Notices issued and payment receipts received.

#### 10. Review

10.1 The Trust Staff Travel Group and the General Manager, Operations Support Unit through the Facilities Division Management and Governance Group, will review the Terms of Reference of the panel annually to ensure that it remains fit for purpose and is best facilitated to discharge its duties.

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 22 of 26

# **APPENDIX 3: COMMUNICATION PLAN**

# **COMMUNICATION PLAN**

The following action plan will be enacted once the policy etc. has been approved.

Staff groups that need to have knowledge of the policy	All staff users.	
The key changes if a revised policy	<ul> <li>Removal of Departmental permits from circulation.</li> <li>An increase in the Vehicle Clearance Form charge to requests from Departments for non-patient clearance</li> <li>Change in parking regulations at blue badge holder parking area, main entrance Wonford Hospital.</li> </ul>	
The key objectives	<ul> <li>The policy specifies how the Trust manages the limited car parking spaces and traffic management issues within the hospital site</li> <li>To give guidance to all staff users the arrangements available</li> </ul>	
How new staff will be made aware of the policy, e.g. induction process, cascade etc.	Posting on Trust Intranet site	
Training available to staff	N/A	
Any other requirements	N/A	

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 23 of 26

#### APPENDIX 4: EQUALITY IMPACT ASSESSMENT TOOL

Name of document	Car Parking Policy	
Division/Directorate and service area	Operations Support Division Car Parking Department	
Name, job title and contact details of person completing the assessment	Alison Knowlton Security, Portering, Access Control & Car Parking Manager 01392 406926	
Date completed:	11 June 2015	

## The purpose of this tool is to:

- identify the equality issues related to a policy, procedure or strategy
- **summarise the work done** during the development of the document to reduce negative impacts or to maximise benefit
- **highlight unresolved issues** with the policy/procedure/strategy which cannot be removed but which will be monitored, and set out how this will be done.
- 1. What is the main purpose of this document?

To address limited parking spaces, and traffic management issues across the Trust.

2. Who does it mainly affect? (Please insert an "x" as appropriate:)

Carers 

Staff 

Patients 

Other (please specify) Visitors

3. Who might the policy have a 'differential' effect on, considering the "protected characteristics" below? (By differential we mean, for example that a policy may have a noticeably more positive or negative impact on a particular group e.g. it may be more beneficial for women than for men)

Please insert an "x" in the appropriate box (x)

Protected characteristic	Relevant	Not relevant
Age		
Disability	$\boxtimes$	
Sex - including: Transgender, and Pregnancy / Maternity		
Race		
Religion / belief		$\boxtimes$
Sexual orientation – including: Marriage / Civil Partnership		

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January 2023

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 24 of 26

	ght this document be particularly relevant to (e.g. those affected by nelessness, bariatric patients, end of life patients, those with carers etc.)?
Do	you think the document meets our human rights obligations?
Fee	el free to expand on any human rights considerations in question 6 below.
A qu	ick guide to human rights:
•	Fairness – how have you made sure it treat everyone justly?  Respect – how have you made sure it respects everyone as a person?  Equality – how does it give everyone an equal chance to get whatever it is offering?
•	<b>Dignity</b> – have you made sure it treats everyone with dignity? <b>Autonomy</b> – Does it enable people to make decisions for themselves?
duı	oking back at questions 3, 4 and 5, can you summarise what has been done ing the production of this document and your consultation process to port our equality / human rights / inclusion commitments?
dui suj 1. Ca	ing the production of this document and your consultation process to
1. Ca their i 2. Sta to pro	rers could be discriminated against, if the car parking policy did not recognise needs.  If with disabilities may need a parking permit as a reasonable adjustment; failure wide such an adjustment could be discriminatory.
1. Ca their i 2. Sta to pro 3. Blu	rers could be discriminated against, if the car parking policy did not recognise needs.  If with disabilities may need a parking permit as a reasonable adjustment; failure vide such an adjustment could be discriminatory.  The badge holders have significant mobility difficulties and failure to provide
1. Ca their i 2. Sta to pro 3. Blu appro 4. Pa	rers could be discriminated against, if the car parking policy did not recognise needs.  If with disabilities may need a parking permit as a reasonable adjustment; failure wide such an adjustment could be discriminatory.
1. Ca their i 2. Sta to pro 3. Blu appro 4. Pa may s 5. Co Trust Direc	rers could be discriminated against, if the car parking policy did not recognise needs.  If with disabilities may need a parking permit as a reasonable adjustment; failure vide such an adjustment could be discriminatory.  The badge holders have significant mobility difficulties and failure to provide priate concessions could be discriminatory.  The badge holders have significant mobility difficulties and failure to provide priate concessions could be discriminatory.  The badge holders have significant mobility difficulties and failure to provide priate concessions could be discriminatory.  The badge holders have significant mobility difficulties and failure to provide priate concessions could be discriminatory.

Car Parking Policy - Extension granted by Chair of OB 21/01/2022, expiry date now January 2023

Ratified by: Hospital Operations Board 16 October 2015

Review date: April 2018 Page 25 of 26

Issue:	
How is this going to be monitored/ addressed in the future:	
Group that will be responsible for ensuring this carried out:	