

SUNDERLAND CITY COUNCIL

PARKING ENFORCEMENT REVIEW

MAIN REPORT

October 2008

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SUNDERLAND CITY COUNCIL PARKING ENFORCEMENT REVIEW

Contents

| Section | Title | Page |
|---------|--|------|
| 1 | Introduction | 3 |
| 2 | Executive Summary | 6 |
| 3 | Background | 11 |
| 4 | Details of Study Tasks | 13 |
| | Part A: Traffic Regulation Order Management | 13 |
| | Part B: Traffic Regulation Order Survey and Preambles Analysis | 24 |
| | Part C: Parking Administration Service | 28 |
| | Part D: Enforcement Service Provision | 32 |
| | Part E: Cash Receipting and Call Centre | 36 |
| | Part F: IT Review | 38 |
| | Part G: Finance | 41 |
| | Part H: Legal Processes | 43 |
| | Part I: Review of Action Plan and Comments on Business Process Re-engineering | 44 |

Appendices

| | |
|----------------|--|
| Appendix A | Recommendations and timescales |
| Appendix B | TRO survey results (<i>See Annex to Appendices</i>) |
| Appendix C | Actions undertaken by Parking Board during review period |
| Appendix D | The council's enforcement service data analysis |
| Appendix E | IT cost sheet for procurement of new system |
| Appendix F(i) | BPR process comments |
| Appendix F(ii) | Action plan with additional comments (<i>See Annex to Appendices</i>) |
| Appendix G | Study brief |

SUNDERLAND CITY COUNCIL PARKING ENFORCEMENT REVIEW

Section 1 – Introduction

1. In May 2008 Sunderland City Council “the council” commissioned RTA Associates Ltd “the Consultant” to undertake a review of the operation and management of car parking throughout Sunderland. The Scope section of the Study Brief (Appendix G) outlined the key deliverable of the review as “a definitive assessment of the fitness for purpose of the current parking enforcement/CPE arrangements in Sunderland”. The most important considerations were to be legal compliance and effectiveness, and the development of a programme of any improvements necessary to achieve fitness for purpose for the future.
2. The review developed from the work that the council had undertaken in respect of car parking in the City including the 2005 Post Implementation Review, the subsequent Action Plan, the Decriminalised Parking Enforcement (DPE) Transfer Project Plan, and the sample review of on-street parking restrictions. Most of that work resulted from challenges to the council, and changes necessary as the result of new legislation. A Business Process Reengineering (BPR) project is also currently in progress with a primary objective to reduce the number of road traffic accidents within the city, which is directly linked to parking enforcement.
3. The review includes the on-street and the off street surface car parks operations now managed by the council (previously managed by NCP Services) together with all associated council functions regarding Traffic Regulation Orders (TROs) and enforcement. The review does not include any current NCP Services operations. This project was developed from the Post Implementation Review to examine whether the council is working efficiently, following the Action Plan and moving forward with improvements to the overall parking service. There is a need to consider the way in which all parking operations (on and off street) fit together, in the context of the recent implementation of Civil Parking Enforcement (CPE) , because public confidence is a key factor.
4. This report centres on two main aspects, which overlap with each other. The first is all aspects of the creation, management and quality control of TROs, including receipt of a request for a new scheme, covering:
 - Design,
 - Consultation,
 - Compilation,
 - Implementation, and
 - Maintenance.The Consultant has carried out a sample assessment of actual examples on street to assess whether delivery matches the process.
5. The second aspect is to review the whole activity of enforcement and its support

processes. This involves:

- An understanding of the council's policies for its parking operations and processes regarding where and how to enforce,
- Recruitment and management of enforcement and notice processing staff,
- Efficiency of procedures including income collection and recovery, and
- Response to appeals and management reporting.

6. Linking these together will provide an insight in to how the council's parking responsibilities all fit together.
7. The review mainly focuses on the recommendations in the council's 'DPE Action Plan', which was used as a starting point and considers the importance of the recommendations relevant to the action plan and how effectively each has been carried out.
8. The priority issues arising as a result of the review will be discussed with the Parking Board and lead to development of a series of prioritised agreed actions. This will include the writing of processes and procedures where required.
9. The ultimate aim of the review is to advise Members, Chief Officers and all interested parties by:
 - Providing an assessment of the overall service,
 - Assessing and reporting on the operation of CPE,
 - Assessing and reporting on the robustness of the TROs in Sunderland,
 - Providing a comparison of current processes and procedures to the council's DPE Action Plan, and
 - Reporting on the 'fitness for purpose' of the whole service for the future.
10. Conclusions are to determine whether there is a need to make any changes to the current operations to make the service more robust and to ensure that the service is sustainable.
11. Part 6 the Traffic Management Act 2004 (TMA) was enacted at midnight on March 30th 2008 and replaced Decriminalised Parking with CPE. This change was mandatory for those Highway Authorities already undertaking DPE. The TMA includes extra contraventions, both moving and static for on street enforcement, that enhance the powers given to highway authorities. These new powers will potentially increase the burden on the off street parking asset as more vehicles are forced to park lawfully.
12. It is essential that on and off street parking provision is regulated by means of TROs and Parking Places Orders and appropriate enforcement schemes. Following challenges made against the Penalty Charge Notices (PCNs) issued by the council further TROs were made to rectify anomalies and an Action Plan was developed to achieve a series of improvements.

SUNDERLAND CITY COUNCIL PARKING ENFORCEMENT REVIEW

Section 2 - Executive Summary

13. The Executive Summary gives a general view of the overall service and a list of the main recommendations made by the Consultant, which are taken from the main body of the report. A full list of recommendations and observations with priorities and suggested timescales is given in Appendix A.
14. Having undertaken numerous parking service reviews across England and Wales the Consultant has extensive experience of the core functions required for the scheme to be successful and robust. The Consultant has determined that the whole parking service provision is definitely fit for purpose and that the council is to be commended for its efforts in providing a quality service that in the Consultant's view is in the upper quartile nationally. Many of the recommendations in this report are made on the basis of cost savings that could, in time, be made while not impinging or improving on the quality of the current service delivery. Many of the recommendations can be taken as observations that can assist in continuous improvement to the service in adapting to new national legislation and guidance.
15. The ever changing nature of the process, from the continual on-site repairs to signs and lines, the changes in parking patterns through redevelopment or new industry, through to national changes to parking legislation means that parking authorities have to be constantly updating procedures. The act of enforcement is never pleasant and it is to be remembered that despite negative media reports across the country, enforcement is only actually necessary as a result of a minority of motorists deliberately or inadvertently parking unlawfully. The council as Highway Authority is tasked with keeping the free flow of traffic within its administrative boundaries and the enforcement of parking is a major step towards achieving this task. In all the reviews undertaken by the Consultant, no authority has ever got the system absolutely correct as that is almost impossible to achieve. It is therefore considered within the parking industry that continuous improvement plans are the best way to monitor performance and to ensure progress in service delivery.
16. The council has achieved very high standards of parking service provision while also recognising that continuous improvements are needed to make the system more efficient and cost effective and whilst ensuring it is legal and fair to the motorist. A repeated comment within the report is that the issue of quality PCNs is evident, rather than quantity. The ticket issue for Sunderland is low compared to similar size authorities. The council adopts a firm but fair approach and this was witnessed at first hand by the Consultant while accompanying several enforcement officers during their daily routines. The rapport with the public was excellent and the professional manner in which they dealt with queries as the public face of the council is to be commended.

17. The adverse publicity that the council has suffered of late prompted a major re-evaluation of how the parking enforcement service was to be provided. It is clear that in the first eight months of this new method of service provision that the council has taken huge steps to improving the image of the service and the arrangements in place in relation to parking. There is a difference between public perception and what is actually being delivered within the council. Parking enforcement rarely receives good press but the council could make more of the positive aspects of the statistics. For example the Consultant noted that of 11,603 PCNs issued in 2007/2008 only 16 were lost when appeals were made to the independent adjudication service. This is an excellent indicator that quality notices are being issued as opposed to quantity. In the same period a similar sized city in the north of England issued in the region of 33,000 PCNs which again indicates the firm but fair approach by the council. This is also a further indicator that the TROs themselves are robust in that challenges are not proving to be successful against the legal validity of the Orders.
18. The Parking Services section is striving to bring about improvements to the new service as fast as possible while they are also under a lot of pressure to keep the service on track. They are highly motivated and the morale among the whole staffing structure is high. This is mainly due to the knowledge that everyone is aware that it is a team effort and that they have the backing of senior management in relation to the improvements being made and that processes are being put in place to make the service easier to work and more transparent to understand.
19. In addition the amalgamation of the two administration offices and the Parking Enforcement team in to one building is a major step forward and is to be commended.
20. The Traffic and Road Safety section and Legal Services are also very positive in their desire to see improvements in the operation, despite the delivery difficulties they face in this challenging environment.
21. The council has achieved a high standard of parking service provision and has worked hard towards completion of the tasks listed in the Action Plan. Completion of these and taking action on the main recommendations of this review and the BPR report will help make the parking service stronger and more robust although it has to be said that the service is already well above average in comparison to other authorities.
22. The following recommendations, where necessary, will be the subject of the development of Actions Plans to ensure delivery and measure progress towards that delivery. Further details on the recommendations including prioritisation, timescales and status is given in full in Appendix A.

Recommendations are as follows:

Part A: Traffic Regulation Order Management

- i) That the council holds a half-day seminar for everyone involved in managing parking and TROs that underpin that management.
- ii) The restructuring of the Traffic and Road Safety section should be completed as soon as possible, and be subject to a review after six months.
- iii) A formal system to prioritise service requests is implemented as quickly as possible. This may include two levels where further action cannot be justified, an immediate reject and a reject after further investigation.
- iv) A joint TRO process procedure is developed by Legal Services and the Traffic and Road Safety section, with issues clearly defined as the responsibility of the appropriate discipline. Legal Services already has a process that requires amalgamating with a process from the Traffic and Road Safety section.
- v) Restriction descriptions are written to a tolerance of +/- one metre.
- vi) The council converts its TROs to mapped schedules.

Part B: Traffic Regulation Order survey and preambles analysis

- i) Legal Services gives consideration to incorporating some of the articles suggested by the Consultant.
- ii) Further work takes place to create a generic set of articles covering all scenarios. The Orders as they stand are legal and robust, this item of work would simply make the Orders easier to understand for everyone in the making, delivering and administering of the Orders if a consistent set of Articles were to be used.
- iii) Minor maintenance and drafting issues identified in the sample survey are rectified in respect of the minimum tolerances used for measurement in general.

Part C: Parking Administration Service

- i) A permanent Parking Services Manager is appointed to take the service forward.
- ii) Work to produce a complete set of standard documents be continued and prioritised.
- iii) The Parking Charter is updated.
- iv) Preparations commence to bring the IT system in-house at the end of the current contract with NCP Services.
- v) The council looks to procure a new IT system coincident with bringing the service in-house.
- vi) Methods of issuing of Blue Badges be examined with the potential to transfer the service to Parking Services.

Part D: Enforcement Service Provision

- i) The whole enforcement service should be brought back in-house as soon as the current contract with NCP Services concludes.
- ii) Deployment beats should start to be worked up in anticipation of the new staffing structure and the potential increase in scooters to cover more weekend working, areas outside of the City Centre and providing more evening deployment.
- iii) As a matter of priority the Enforcement Manager should to be given full access to the IT system and extra training in the use of the system.
- iv) Review whether the council on street CCTV can be linked to the police control room.
- v) That independent compliance surveys are undertaken on several beats to prove a fair regime of enforcement has been adopted. This would catalogue potential PCN issue based on independent analysis and should alleviate some public concerns over the nature of the service.

Part E: Cash Receipting and Call Centre

- i) Use of the Contact Centre should be better integrated into the Parking Strategy; its services are poorly used at present, with poor access to parking related information, and a lack of awareness on the part of Contact Centre management of their role and how parking as a service is changing.
- ii) Parking back office procedures for payment handling could be streamlined to provide a more efficient internal system; currently there is double handling of information.
- iii) The requirements of Parking Services should be built into the specification for the new council payment processing system.
- iv) A more efficient internal operation would result from the use of workflow processing techniques within the PCN processing software.
- v) The Contact Centre, payment processing and Parking Services should be provided with access to the PCN database.
- vi) Information on the council's website in relation to parking is minimal. This whole aspect should be reviewed and developed. The terminology used contains errors and there should be a better facility to offer on-line PCN payments.

Part F: IT review

- i) As previously stated the council should plan now for the end of the NCP Services contract for IT provision.
- ii) The council needs to decide how future IT needs are to be met; the Consultant recommends bringing the IT in-house to save costs and to provide better data access. A procurement process should occur, starting no later than the end of 2008, with an implementation date of about a year later. This will imply deciding soon on the future of the contracting strategy for the council parking IT provision.

Part G: Finance

- i) Consideration be given to increasing expenditure on signs and lines maintenance to cover parking related repair work as an invest to save measure.
- ii) Review the cash collection service with a view to preparing to bring the whole service back in house at the end of the current contract.
- iii) Plan to close the Frederick Street facility and terminate the lease at the earliest opportunity.
- iv) Adopt the Band 2 level for PCNs at the earliest opportunity, subject to a council policy decision.

Part H: Legal Processes

- i) Consider adopting plans as schedules to the Orders in due course. This may be a future improvement once the current work on updating the Orders is completed. This will apply to both on and off street orders.
- ii) That Legal Services agrees a workflow chart with the Traffic and Road Safety section that sets out the responsibilities for the process of implementing new and amended Orders.

Part I: Review of Action Plan and comments on the BPR

- i) A further review of the Action Plan as a result of this report is now required.
- ii) Identify a condensed list of priority items from the Action Plan.
- iii) Some items in the action plan have been described as complete in the May review. Although some elements of these items are completed, it has been made clear where further work would be beneficial.
- iv) Those elements of the action plan that depend upon the BPR are acted upon without waiting for completion of the BPR.

SUNDERLAND CITY COUNCIL PARKING ENFORCEMENT REVIEW

Section 3 - Background

The environment

23. The metropolitan district of Sunderland was granted city status in 1992. Situated on the north-east coast of England, it covers an area of 13,737 hectares and contains three distinct settlement areas: the heavily urbanised north and south banks of the River Wear estuary to the east of the A19 trunk road; the maturing New Town of Washington to the west of the A19; and a sprinkling of smaller, former coalmining settlements - largely separated by open countryside - in the south of the district.
24. The city has good transport links, with the A19 dissecting it and the A1 adjoining to the west. The Tyne and Wear Metro and local rail services provide access to Tyneside, Newcastle International Airport and the East Coast mainline rail services. A direct mainline rail service from Sunderland to London opened in 2008.

The population

25. Sunderland has a population of 280,600, (2006 mid year estimate). As with many other parts of the country, Sunderland has an ageing population. With births and deaths very closely matched over recent years, this is largely a consequence of a longstanding net outward movement of younger working people from the city combined with the increasing longevity of its elderly population. Life expectancy at birth has increased to 75.5 years for males and 79.8 years for females although this remains some way below the average life expectancy for England (77.3 years and 81.6 years respectively).

The economy

26. The city is striving, with considerable success, to deal with the decline caused by the loss of traditional industries. Thousands of new jobs have been created as part of a large-scale industrial shift towards the automotive manufacturing and service-based 'call centre' sectors. Significant success has been achieved, notably through the Doxford International development at which 8,000 jobs have been created.
27. Whilst great progress has been made in regenerating the city, there are still many issues to be faced and overcome as a consequence of the economic and social change the city is undergoing. The city enjoys a good reputation for providing quality services that meet these needs and raise the aspirations of local people.

Parking enforcement and administration service provision

28. The council has managed the enforcement of parking under a 'Decriminalised' regime

since February 2003 utilising external contractors for the enforcement and part of the administration functions.

29. Since December 2007 the council has undertaken the majority of the enforcement role and also taken the related administrative functions back in house. There is an ongoing process within the council to improve the business and to provide as good a service as is possible within the constraints of national legislation and local resources. Internal control of these two elements of the service will allow greater understanding of the role by the council and give officers greater flexibility to adapt to local needs on a daily basis.

SUNDERLAND CITY COUNCIL PARKING ENFORCEMENT REVIEW

Section 4 – Details of Study

Part A: Traffic Regulation Order Management

This section is subdivided into sub-sections as follows:

- Introduction to TRO issues,
- General TRO issues,
- Prioritising requests for parking restrictions and designing them,
- Consulting and agreeing proposals and making TROs,
- Installing the restrictions and maintaining them, and
- Restriction tolerances, the use of ParkMap, and mapped schedules

a) Introduction to TRO issues

30. TROs legally underpin the ability of the council to create and enforce a parking restriction and permitted parking areas. This section examines the whole life-cycle of a parking, waiting or stopping restriction and permitted parking area (henceforth they are all referred to as “parking restriction” for ease of description).
31. The regulation of traffic by TROs is a function of a Highway Authority, with powers to introduce the Orders given by the Road Traffic Regulation Act 1984 (RTRA 1984). Trunk Roads remain the responsibility of the Secretary of State.
32. A TRO can be introduced on any length of road that is defined as public highway, or on any road to which the public has access, including bridges over which a road passes.
33. The council is tasked with controlling traffic flows throughout the city and the Traffic and Road Safety section has overall responsibility for the management of the TROs.
34. Although all orders are made under the provisions of the RTRA 1984, enforcement in Sunderland is carried out by the local authority by virtue of The Road Traffic (Permitted Parking Area and Special Parking Area) (City of Sunderland) Order 2002 (Statutory Instrument 2002 no 3266).
35. Therefore the making of a TRO, and its subsequent management, giving the council the legal ability to enforce any given restriction, is a fundamental part of the operation of parking enforcement.
36. Under Section 1(1) of the Road Traffic Regulation Act 1984 a Traffic Order can only be made for one of the following reasons;
 - For avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising,

- For preventing damage to the road or any building on or near the road,
- For facilitating the passage on the road or any other road of any class of traffic (including pedestrians),
- For preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property,
- (Without prejudice to the generality of the above bullet point) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, and
- For preserving or improving the amenities of the area through which the road runs.

37. This part of the work has been to review the whole life-cycle of a parking restriction from first concept through design, consultation and approval, making a TRO, signing and lining, enforcement and maintenance. Different council departments (and some contractors) are responsible for parts of this process and they all need to be clear what their role is, how it fits in to the whole operation, and the implications of error.
38. In theory this is a one-way process, but at each stage there are technical and legal decisions that need to be taken and any one issue may go backwards and forwards between different stages a number of times. The principle should be to make each stage as simple and as clear as possible to minimise confusion and maximise the efficiency of the operation.
39. Most individuals are fully involved in the process and are dedicated to achieving enforceable parking restrictions in Sunderland. However officers are sometimes overwhelmed by the complexity of the whole operation and lack of staff in key positions has also hindered progress. The BPR has been established and is already reviewing the process.
40. The review has identified areas of the processes that will lead to better communication and understanding, and will result in time and cost savings. It is important to strive for 100% accuracy, but that is not always possible. Indeed there is often no definition of "accurate". More important is "fitness for purpose" and the resulting confidence that quality remains high. Therefore any system should have built in checks, to allow problems to be identified at an early stage or to correct them if found later.

b) General TRO issues

41. It is important that different sections of the organisation work together. Therefore the Consultant has tried to ensure that communication is clarified and meetings have a specifically defined purpose.
42. Whilst most individuals involved in the process have a clear idea of their own responsibilities, knowledge is not consistent and people do not always know how their work affects others. Therefore the Consultant recommends that a half-day seminar is held for everyone involved in delivering and managing parking restrictions and the TROs

that underpin that process. This will allow everyone to see how they fit in to the process and show how important each part is to the whole. This should include people who do not necessarily see themselves as having a role, as those can be the most critical, and should include:

- Service Request team,
- Capital Investigation and Programming and Capital Scheme Delivery teams,
- TRO team,
- Legal Services (anyone writing preambles to TROs and making them),
- Parking Services (including CEOs and Notice Processing staff),
- Highways Maintenance (including staff from Aurora and Community and Cultural Services (CCS)), and
- Managers of all the above teams

43. Directors and Heads of Service should be included in the seminar and a separate seminar should be considered for relevant Councillors, to develop their understanding of parking related issues.
44. In addition, the ongoing restructuring of the Traffic and Road Safety section leads to some lack of understanding of where certain responsibilities fall. This will be rectified as part of the BPR project. The Consultant recommends that the restructuring is completed as soon as possible, so that there are clearer lines of responsibility.
45. The Consultant supports the formalisation of the interim measure as part of the BPR process to have a TRO team specifically dealing with all TRO issues including maintenance, and the Service Request, Capital Investigation and Programming and Capital Scheme Delivery teams working closely together to define and prioritise schemes.
46. A further general comment is that the council's requirements for accuracy of information and requirements for consultation are resulting in significant delays in getting schemes delivered on the ground. Two examples are given here, and expanded later in the report:
- a) When a scheme is being consulted upon, requirements include details and diagrams of associated works. For example the expectation is the exact locations of signs and their diagram numbers be included. These are matters best left until after the scheme has been agreed; otherwise much time is wasted doing design drawings that have to be changed.
 - b) The accuracy of stating TRO locations is currently required to the nearest 0.1 metre. Whilst this may be necessary for construction works it is never required and rarely achievable for line painting. It leads to false assumptions of accuracy.

c) Traffic Management processes

47. This covers the work of the Service Request, Capital Investigation and Programming and Capital Scheme Delivery teams in the proposed service structure. This report does

not cover issues concerning the validity of a proposed scheme' nor does it cover issues other than the parking restrictions, although it is appreciated that many schemes do not involve parking restrictions at all and that in others they are just one element of a scheme.

48. This report focuses on what happens when parking is impacted upon by a scheme and parking provision is an integral part of the project, to make sure that it can be enforced properly to assist the intended purpose of the scheme.
49. The proposed structure of the Traffic and Road Safety section and the work of the BPR have recognised the areas that need further resource. As a check on the new structure it should be reviewed after six months of operation.
50. The Service Request Team should be a single point of contact for any new request for a scheme, and be responsible for informing the requestor of its progress. They should continue to develop their existing spreadsheet of requests. The BPR is working on this and should include finding simple ways for the team to identify which requests are most urgent and how many requests are at which stage at any one time.
51. There is no formal system to prioritise a request although it is understood that one is being developed through the BPR. The Consultant recommends that this is completed as soon as possible. The aim should be for the Service Request team to be empowered to eliminate a significant proportion of requests at an early stage, before submitting the remainder for investigation.
52. Once a request has cleared the service request stage it should be passed to the Capital Investigation and Programming team for further work. This happens now and the BPR process will formalise this. It is understood that a scheme will be then allocated to a specific engineer who will be responsible for co-ordinating its progress. That engineer will also be responsible for keeping the requestor informed.
53. At present such requests are included on a "promised list". This implies it will actually happen, when it is really on a list for further investigation. The list should be renamed accordingly. There is a general expectation by the public and members that all requests will happen. The council needs to develop policies for how requests will be considered, for example junction protection (restrictions to prevent parking on junctions and within sightlines), residents parking schemes, disabled bays. These should be linked back to the council's transport priorities, as set out in the Local Transport Plan.
54. Designers will need to consider the implication of parking and waiting when designing a scheme. There does not appear to be a consistent set of guidelines regarding those parking or waiting restrictions to consider. The council should write a set of guidelines. This should include principles that the parking restrictions should be as simple as possible to achieve the likely objectives of the scheme. For example:
 - a) If it is decided that No Waiting should apply during the working day, the times and days should be standardised as far as practicable. No Waiting Monday to Saturday

8am to 6pm is the most common. This will allow CEOs and the public to more clearly understand the restrictions, allow the Parking Manager to plan beats more effectively and consistently, and minimise the opportunity for the wrong signs to be erected from a varied stock.

- b) If it is decided that No Waiting at any Time lines need to be installed at a junction, their length should not be rigidly set at 10 or 15 metres but should be set as a range, e.g. minimum 10 metres, maximum 20 metres. As is discussed below, absolute measurements are open to different interpretations, particularly if junction layouts change. It is better to use a fixed point that is unlikely to change, for example “the boundary between numbers 1 and 3 North Street”, even if this measurement happens to be, say 12.2 metres. This minimises the likelihood of discrepancies occurring between what the TRO says and what is marked on the street.

- 55. It is noted that it is intended that the TRO team becomes responsible for the detailed design of the Traffic Orders in a scheme, in conjunction with the project designer. This is welcomed, to maximise the opportunity for consistency. However, it is understood that this cannot take place until the consolidated orders work is completed, which should therefore be prioritised to be finished as soon as possible. In the meantime, some time from the TRO team is being allocated to assist the designers in completing the consolidation orders, which is appropriate.
- 56. There is a lack of clarification of the processes and terminology for consultation. There is only one statutory requirement for consulting upon proposed TROs, which is carried out by Traffic and Road Safety section and then Legal Services undertake the statutory publication of the proposals by way of advertisement and the taking of objections. This is set out in the Local Authority Traffic Orders (procedures) (England and Wales) Regulations 1996, part II regulations 6 to 8. The initial consultation on any scheme includes the proposed parking restrictions, and this good practice should continue. The initial consultation should be undertaken by the designer responsible for the scheme, but he or she should liaise with the TRO team to ensure continuity.
- 57. The TRO team uses a bespoke GIS package, ParkMap, to map restrictions. This should be used at the very earliest stages of a design and further discussion takes place in sub-section 7 below.

d) TRO and legal processes

- 58. There is a critical link between the TRO team in the Traffic and Road Safety section, and Legal Services.
- 59. There is clear evidence that the teams joint working is improving, and that there is work in progress to streamline their joint approach to the benefit of the council.
- 60. Both teams recognise that Legal Services should take the lead on legal issues in respect of the TROs, including the drafting of the preambles and the formal advertising and sealing of the orders and that the TRO team within the Traffic and Road Safety

section should take the lead on the technical engineering aspects of the TROs, including design, measurements and consultation and to ensure that they are correctly represented on the ground.

61. These two are very different professional disciplines and the Consultant recommend that as well as the regular progress meetings between the two, a joint process document should be prepared, to ensure that responsibilities are clearly defined. It is also recommended that the regular progress meetings define a set of joint improvements to the processes and has a standing agenda item to ensure progress with these.
62. Legal Services has a fully documented, comprehensive procedure for making Traffic Orders. This covers some Traffic and Road Safety sections process as well as all Legal Services processes. In addition, the procedure document contains a checklist of actions to be followed in making a TRO. However, this is just the Legal Services actions and does not contain any dates or deadlines.
63. The Traffic and Road Safety section also has a collection of procedures for various parts of their process, including four separate flow charts towards the creation of a TRO. It is comprehensive, but could be adapted to make it more user-friendly for individual projects. Again, it contains no dates or deadlines which would assist with more effective applications.
64. In terms of actual projects, Legal Services and the Traffic and Road Safety section each has its own spreadsheet of schemes and their progress. A lot of work has been done to create a combined spreadsheet, listing the key milestones in each scheme and their completion dates. This draft list has over 150 schemes on it.
65. The work is progressing slowly owing to available resources, and possibly the difficulty in getting all the information to complete the spreadsheet. The Consultant recommends that the initial work on the spreadsheet is urgently completed and implemented, even if that means leaving some schemes off or not completing full information for them. The spreadsheet will form the basis of a much better control of TRO implementation, including setting of dates within a programme.
66. It is understood that draft orders are subject to an iterative development between Legal Services and the Traffic and Road Safety section, whilst minor wording is agreed. Although this shows that care is being taken to ensure that the order accurately reflects the technical requirements the review noted that this has the potential to delay the process. There is a standard set of descriptions available, but these are not necessarily consistently used.
67. Currently schedules are re-written from the basic information provided in ParkMap. This is both time consuming and is more prone to human error so is not recommended as best practice. Descriptions can be generated directly from ParkMap. It is possible for Buchanan Computing, the providers of ParkMap, to write a bespoke output format. The

Consultant recommends that a preferred format be agreed and schedules created direct from ParkMap.

68. It is also recommended that a change is made to the use of mapped schedules. This is explained further in sub-section 6 below.
69. As approved restrictions are moving towards implementation, Traffic and Road Safety section also need to make arrangements for the scheme to be lined and signed at the same time as the order is sealed by Legal Services so it can be enforced with the minimum of delay. It would assist everybody, particularly the public, if a date could be agreed early on, and intermediate deadlines also agreed.

e) Maintenance processes

70. This section covers the physical signing and lining of the restrictions on street and their maintenance. Procedures were found to be unclear and not conducive to confident enforcement.
71. The TRO team understands that it is its responsibility to ensure that signing and lining for new schemes is done. It has a clear flow chart for this work.
72. For lines, the TRO team prepares drawings and places an order with CCS the council's lining contractor. The TRO team sets out the locations on site and supervises their correct installation. The contract with CCS, has not been inspected by the Consultant, but it may be worth considering the extent to which CCS should be responsible for their own accurate marking out and quality checking. Time could also be saved on schemes if CCS could be passed as competent to interpret the lengths and line types from ParkMap plans rather than having a council officer supervising on site.
73. For signs, the TRO team prepares drawings and draw up a bill of quantities. An order is placed with Aurora as the council's current signs contractor. Again, consideration should be given to making Aurora responsible for correct production and erection on site from basic information provided. For example, they don't need to have an actual drawing of a standard sign to diagram number 639 from TSRGD provided to them each time. They could produce these themselves correctly from a simple spreadsheet initially provided by the council.
74. There is no clear maintenance regime in place. There is no documented, regular inspection and there are no explicit quality standards. The Consultant recommends that it should be formalised as part of the remit of the Highways Maintenance section.
75. CEOs have had some training to identify defective or missing signs or lines and report them. There is an expectation that Highways Inspectors in the Highways Maintenance section should have the same training and reporting process. However, they have not been trained so it is recommended that this is undertaken urgently.

76. The rectification of reported defective lines is not clear. The Consultant recommends that clear lines of responsibility are drawn up, with part of the CCS contract to include minor/remedial repairs which can be affected immediately and which could be coordinated and instructed by the Highways Inspectors.
77. The rectification of reported defective or missing parking signs is also not clear. The CEOs hold a stock of common signs at their office and put them up themselves. If they do not have a sign in stock an order is made through Aurora, who then provides them to the CEOs or the Traffic and Road Safety section to erect. This practice is not appropriate, is inefficient and is not effective. The Consultant found that a sign reported as incorrect in a previous review in January 2008, was still incorrect, and this in an area where a high level of enforcement could take place. Part of the Aurora contract should include a signs maintenance regime.
78. The Consultant considers that the whole issue of signs and lines maintenance requires closer attention. Parking signs and lines should be treated no differently to other defects found on the council's highways, and indeed it could be argued are more critical as they have a legal backing to be correct through the TRO. A defect can have an implication on the council's ability to enforce. Staff who are regularly out on the street can be trained to report defects they spot during routine visits to a central contact point and a process implemented for ensuring defects are followed up.
79. Funding for the maintenance of signs and lines should be prioritised in the knowledge that a priority system has to be adopted, as a poorly defined line or missing sign directly impacts on the council's ability to deliver effective enforcement.
80. The Consultant recommends that there is a full set of procedures written for signing and lining and maintenance processes. This should identify:
- Clear responsibilities,
 - Clear guidelines about fault reporting,
 - Priorities for use of limited budgets, and
 - Clear definitions of a maximum acceptable timetable from reporting to correction.

f) Restriction tolerances, the use of ParkMap, and mapped schedules

81. ParkMap is a Geographical Information System (GIS) software package provided by Buchanan Computing Ltd (BCL). It is used by the Traffic and Road Safety section to maintain map records of the TROs. There are a number of comments to make about its use and appropriateness.
82. Whilst the software provides some very powerful tools, it also has limitations. The software is written to operate on MapInfo GIS. The council corporate GIS is ArcGIS, provided by the software company, Environmental Systems Research Incorporated (ESRI). Whilst it is possible to convert files from ParkMap into ArcGIS, this is not an automatic process. Thus the use of ParkMap would always be restricted to the number of users having ParkMap licences, for which there is an ongoing annual maintenance,

support licence cost for each licence.

83. The number of licences is currently limited. The Consultant recommends that it is essential that all staff directly involved with parking restrictions have live access to the current restrictions. In Legal Services, this would enable simple reference to current restrictions when drafting the preambles to a new TRO. In Parking Services, the CEO Supervisor would have direct access to the current restrictions to manage enforcement. The Notice processing staff would benefit from each having direct access to the current restrictions, when answering queries from members of the public and responding to PCN challenges. The Highways Maintenance team (or whoever becomes responsible for reinstating signs and lines) require access to the current set of restrictions in a simple-to-understand map form.
84. Also, it would allow the council to publish its current parking restrictions in map format on the publicly viewable website. This is in accord with e-Government principles, and is encouraged within the Guidance supporting the Traffic Management Act 2004. There are clear advantages of doing this, so that the public has direct access to the parking restrictions, thus assisting them in making appropriate parking choices.
85. Whilst this is possible through ParkMap, the process is not as efficient as it could be, given the number of restriction changes likely to be required annually. It would be possible to create a similar environment to ParkMap, within ArcGIS (for which the council already hold many licences), which would allow all council staff “view-only” access to that data. The data is also compatible with all other GIS-based data sets. For example a data set of accident statistics can be directly compared with restriction details when considering service requests.
86. If the council wish to continue with the use of ParkMap, there are various tools that will assist. It is possible to get standard clauses set up that can be called off as required to ensure consistent terminology. The text schedule generator can be configured either by the user or BCL into a format agreed between the Traffic and Road Safety section and Legal Services, or a mapped schedule module can be used.
87. If text schedules are to be retained, the descriptions to 0.1 metres must be relaxed. This appears to give the impression of accuracy but is actually making the system more difficult to work to. Although the current tolerance is perfectly legal and valid it is not required to be to that degree of accuracy for the purposes of providing TROs or the enforcement service. There are many reasons why 0.1 metres is too specific, and as can be seen in Section 4, Part B; para 100 (f), below, six measurements of the same line, using the same criterion, gave five different results.
- The thickness of the line itself is generally 0.1 metre,
 - The kerbstone itself is generally 0.1 or 0.15 metres wide,
 - Wear and tear on lines or road surface can lead to distances being not accurately measurable (uneven road surface, cobble stones, pot holes etc),
 - Surveyors’ wheels have an accuracy of +/-1%, thus could vary by 0.1 metres in every 10 metres (and many measurements need to be 20 metres or more),

- Extended kerb lines are often impossible to determine due to curved or angled approaches,
- Measurement varies on a curved road depending on whether centreline, drainage channel, kerb line, back of highway or other reference point is used,
- On hills, the distance on the plan is different to the distance on the ground. For example on a 1:10 hill 10 metres on the plan is 11 metres on the ground,
- Ordnance Survey only guarantees its own surveying and GIS data to +/-0.4 metres in urban areas and +/- 1.1 metres in suburban and rural areas, and
- Human error.

88. The adjudicators for the Traffic Penalty Tribunal (TPT), have regards to the phrase 'if the meaning of the line is clear' when dealing with appeals that are based on incorrect line lengths or broken lines. Tolerances will not be defined specifically by the TPT but half a car length, +/- one metre is accepted elsewhere in the industry as workable and acceptable for the purpose of accuracy in these instances. This is important when determining the level of accuracy at Sunderland.
89. Whilst not all of these reasons will apply in every case, differences of +/- one metre are reasonable. It may be appropriate for engineers to plan restrictions to a greater degree of accuracy, but accept some or all of the above discrepancies. Therefore the Consultant recommends that TRO schedules should be quoted to the nearest metre, allowing a tolerance of +/- one metre. As long as the TRO is clearly stated, it is a reasonable practice, and a manageable one which can be defended in cases of adjudication or dispute.
90. A better solution overall would be to have mapped schedules, which are being introduced in many councils and have been praised by Adjudicators for their clarity. The concept does away with the text schedule descriptions, and the TRO articles simply refer to "the plans". Each restriction is mapped on GIS software, with its location on the ground matched up with the same features on the map. The Order schedules then comprise a book of maps with all the restrictions marked on.
91. The council is mapping its restrictions on ParkMap anyway. A module is available to create mapped schedules directly from that information. This avoids the additional process of generating or re-writing the text schedules, so once procedures for data management are in place it is also a quicker process.
92. Mapped schedules would involve further work to implement a process, which can be discussed if required.

Part B: Traffic Regulation Order survey and preambles analysis

Survey analysis

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93. The Consultant's surveyors were provided with sample areas within Sunderland, to measure, record and map the individual TRO items. The items were not influenced by any known issues with TROs, but tended towards the more complicated restrictions. Thus Limited Waiting Bays, Loading Bays and Taxi Ranks were prioritised over single and double yellow lines, and restrictions running only part of a street were prioritised over restrictions running the complete length.
94. In total 42 individual items were checked. They were all in the South Sunderland area; about 80% within the City Centre and 10% each in Ryhope and Woodside. 13 of these repeated the work undertaken by Jacobs in January 2008, both as a quality check of Jacobs' work and to see whether issues identified by Jacobs had been corrected. The full list is included in Appendix B.
95. For each item the surveyors recorded information onto a hand-held PDA containing the Ordnance Survey (OS) data. For each line they recorded:
- Its start and end points, to the nearest 0.1 metre, measured from the nearest point that could be identified on the OS data and the ground,
 - The line type (e.g. DYL, SYL, loading blips, limited waiting bay), and
 - The condition of the line (good, adequate, poor), defined in Appendix B, including the presence or absence of the correct end markings and the presence of any gaps in the line.
96. For each sign they recorded:
- Exact location,
 - Mounting, and
 - Condition
97. For all signs, and for lines where necessary, a digital photograph was taken.
98. Post survey work was undertaken to determine:
- Whether the line and signs meet the requirements of the Traffic Signs Regulations and General Directions (TSRGD) 2002,
 - Whether they match the descriptions given in the draft South Sunderland TRO (or other TRO where it is not to be consolidated into the South Sunderland TRO),
 - Any discrepancies, which have been listed in Appendix B, and
 - Any defects, for example missing sign or poor section of line, which have also been listed in Appendix B.
99. It should be noted that the Consultant's staff do not know all of the issues surrounding the signs and lines on the ground. Therefore where a discrepancy has been reported, it is information "as seen". It is for the council to determine what the suitable action should be; replacement of a sign, refreshing a line, amending a TRO or some other action. Similarly there is no view taken about the appropriateness of a restriction. That is a matter for the council to determine through its traffic management policies.
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100. The Consultant is aware that the council is currently enforcing against TROs mainly introduced in 2003 and 2006 in line with the DPE service provision. The Consultant is also aware that the council was concerned about the accuracy of some of the measurements in the schedules and the complexities involved in enforcing a number of different Orders which had been amended. Hence the creation of the programme to create new orders based on five geographic areas of the council. This review does not include any report on the 2003 and 2006 orders as the council has been replacing these Orders on an on going basis to ensure robust enforcement can be undertaken
101. In addition to the specific issues recorded for particular restrictions in Appendix B, the Consultant has made some general observations here, in no particular order:
- a) There seems to be a general policy of breaking a double or single yellow line where a lane marking crosses it. This is not the preferred convention as within Traffic Signs Regulations and General Directions 2002 (TSRGD 2002), the line must either be continuous or have end markings applied where a break is shown. The parking restriction line is mandatory, the lane marking is advisory, so the parking restriction must take precedence and be continuous.
 - b) There are locations where a loading bay or disabled bay has double termination line at each end as per diagram 1032 of TSRGD, but there are no individually marked bays between. It should have a single termination line at each end as per diagram 1028.3 of TSRGD, unless bays are individually marked within it.
 - c) Within the Controlled Parking Zone (CPZ), there are no signs for single yellow lines as the entrance signs state the times of those restrictions which is correct. However, there are numerous bays (loading bays, limited waiting bays, etc) within the CPZ that are signed through necessity. Whilst in accordance with the TSRGD legislation, it may appear to be unhelpful to the motorist that some restrictions are signed at their location and others signed at the entrances to the CPZ. The distance to some of the parking areas from the entrance to the CPZ needs to be considered when assessing if repeater signs are required.
 - d) There are examples of descriptions varying unnecessarily. For example, Borough Road, No Waiting at any Time says "from a point 84m west of the extended western kerb line of North Durham Street ... etc". However the loading restriction on the same section of road says "83.5m. This is unnecessarily complicated when probably the intention is to refer to the same length of road. This issue would be avoided by the use of a less specific measurement and this is discussed in Section 4, Part A, (f), 86-89 above.
 - e) There are situations where trying to fit a description into a standard pattern can be very confusing. For example, where one road meets another at an angle or the meeting road is on a curve, the definition of the extended kerb line is difficult to determine. An example of this is where Moorside Road meets Glanville Road. The issue is exacerbated where the description is for both sides of the road where the extended kerb line is not parallel to the road yet the intention is to stop the restriction at the same place on both sides of the road. This can be solved by the use of mapped schedules and these are discussed in Section 4, Part A, (f), 80-89 above.
 - f) The use of a distance tolerance of 0.1 metres is far too prescriptive. The following has been surveyed by RTA Associates, and also by Jacobs and by the council. The

proposed schedule states: Ryhope Street. The south side from a point 19 metres west of its intersection with the extended western kerb line of Back Ryhope Street to its eastern extent. The description in the current TRO is 18.6 metres. The description in the new TRO is 19 metres. Jacobs measured it as 19.3 metres. The Consultant measured it as 18.4 metres. ParkMap describes it as 18.9 metres and measures it as 19.6 metres. But these measurements are all referring to the same restriction and there is no doubt on the ground where it applies. The need for a change to agreed tolerances, or to do away with written descriptions altogether, is again given in Section 4, Part A, (f), 86-89 above.

- g) Where standard descriptions are used, there are inconsistencies in the use of TRO schedule terminology. Some places say “from a point xx metres north of the extended northern kerb line of ...” other places “from a point xx metres north of *the intersection of* the extended northern kerb line of ...” and similar examples. In other cases extended building lines are used, for example No Loading at any Time Derwent Street South Back, which says “the north-western side from a point 35.5 metres north-east of its intersection with the extended south-western building line of number 6-10 Stockton Road ... etc” when there is a perfectly good kerb line to be used if that is the agreed standard. As discussed in Section 4, Part A, (f), 86-89 above there is a need to have a consistent description and apply it consistently.
- h) The terminology used, whilst intended to be consistent, is very complicated and can lead to misunderstandings. What are needed are much simpler descriptions. One solution is to have very simple descriptions in the schedules (for example “from its junction with”) and have a one-off schedule or article describing how “junction” is interpreted. Better, is to use measurements from building lines not junctions, as these are much less likely to change. The best solution would be mapped schedules, which do away with descriptions entirely, as discussed in Section 4, Part A, (f), 86-89 above.

Preambles analysis

- 102. The council is consolidating most of its TROs into five, geographically-based, on-street orders. The schedules have been created and checked for South Sunderland, and a draft set of preambles written. Once agreed, these will form a template for the other four geographic areas. The Consultant was asked to comment on the style and content of the draft preambles.
- 103. The preambles to the order cover all the required legal points. However, it is suggested that there are various ways in which the order could be improved, to take out unnecessary clauses and to clarify other matters.
- 104. The Consultant recommends that the council be mindful of the changes in wording in TROs nationally, suggested by the DfT and the Traffic Penalty Tribunal. Amendments could be made at any time in line with the DfT suggestions, but the current wording used remains valid. The Consultant would then recommend further work to create a generic set of Order preambles that can be used for the other geographic orders and any subsequent orders. The Consultant also recommend that where possible standard

articles are used, even if they do not apply to a particular order, so that the TRO writing process can be speeded up in the future. The above suggested changes are as a result of the DfT and TPT stating that reference to penalty charge notice, Civil enforcement officer and any other reference to the means of enforcement other than 'that a penalty charge will be issued to vehicles parked in contravention' may be omitted from any order. They have the opinion that the order should just state what is and isn't allowed. Enforcement is deemed to be separate. This is only a minor recommendation and local preference takes precedence.

Part C: Parking Administration Service

105. Since 2003, the council has undertaken the work necessary to inform the public, deal with enquiries and collect penalty charges that have progressed beyond the 'Notice to Owner' (NTO), stage with NCP Services dealing with pre NTO processing.
106. In December 2007, the council took over the whole of the back office functions covering all stages of the processes involved with the penalty charges. This was to achieve a consistent approach and to make the process more streamlined. At the time of this current review there were still two separate offices, one working on pre NTO functions and one on post NTO functions with no overlap of work possible as the offices are located a half mile apart. This review has taken regard of the fact that the two offices were due to be amalgamated during August 2008 which would have been a major recommendation of this report had that not been the case.
107. The council has produced a 'Parking Charter' including guidance on parking in Sunderland. This is a well-written document and provides the necessary level of detail to enable the public to understand the reasons behind the issue of PCNs and also gives information on how to appeal against a penalty charge.
108. The 'Parking Charter' was first issued in January 2008 and as new legislation was introduced in March 2008 it is now necessary for an updated version to be produced to cover the changes that are or have been implemented under the new legislation. This document is used by the administration team as a basis for determining appeals at all stages of the process. The document is in addition to the guidance produced by the Department for Transport (DfT), and the Traffic Enforcement Centre (TEC), and is presented in an easier to read and understand format than those other documents. It is a publicly available document and sets out clear guidelines for the administration team to follow and for the public to understand why decisions are made.
109. The administration team uses a specialist software package known as 'Gateway' for the processing of all documents in relation to the parking enforcement service. The specialist software, which is one of four on the market, is currently hosted externally by NCP Services.

110. This review is not concerned in overview with the ability of the software to allow the section to undertake its functions, but the Consultant is aware of the package and it is well known in the industry as fit for purpose in this respect.
111. Officers who use the software gave a high rating for ease of use of the system but were critical of the network arrangement as this slowed down the system and they were unable to extract reports first hand and had to ask NCP Services for help. Use of multiple screens was also not possible. For example the Consultant requested a simple report to be run but had to wait for NCP Services to send it by CD as the file size was too large to transmit over the network. This is clearly not the most effective way of working and creates delays in the processing system.
112. It was noted by the Consultant that a large notice in the Civic Centre Cashiers reception was advertising a contact number for the parking section enquiries. On ringing the number it was found to be obsolete.
113. Parking Services uses an out of date PCN flowchart which requires updating to the new legislation contained in guidance notes to the TMA 2004.
114. It is noted that Blue Badge use is high in Sunderland with an estimated level of 1 in 5 of local vehicles having a Blue Badge. These are currently issued through the Contact Centre, which also utilises the Occupational Therapy service when required. The Consultant recommends that an internal review of the method of issuing blue badges is undertaken with the potential to either pass this function in its entirety across to Parking Services or to set up a joint function between the two parties. Use of a pro-forma on the parking website for blue badge applications will reduce the workload in dealing with blue badge issue and would reduce the potential for fraudulent claims.
115. Incoming post to the section is dealt with in the most efficient manner available at present. Amalgamation of the two offices and the move to scan all incoming mail will further improve the service. The Consultant recommends that the use of bar codes on all PCNs would further improve the service allowing scanned items to automatically be linked to PCNs on the IT system.
116. It was noted through interrogation of the system that in 2008 only 113 appeals were taken to the adjudication service out of 11,603 PCNs issued at a level of 0.97%. A ratio of 0.16% of all tickets issued being lost at appeal compares very favourably with national statistics. At the appeal stage the council has a success rate of 69%, which is above the national average of 40-50% indicating that the council is issuing quality tickets within a robust system.
117. In the first three months of the 2008 financial year, 2763 PCNs were issued of which 57% were paid within the discount period. This is higher than the national average of 50% and again shows quality rather than quantity in PCNs issued.

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118. Bailiff recovery rate of all warrants is approximately 20%. This is consistent with national statistics and is not a cause for concern.
119. It was noted that a pre debt letter is not currently sent out before applications for warrants are made to the County Court. Although not required by legislation a pre debt registration letter provides the motorist with a final reminder of the progress of their PCN and can be used to avoid the issue of warrants. Typically this letter can reduce debt registrations by 20% and this stage of the administration process is the one most under pressure at the present time with a backlog of over 2000 cases waiting to go to debt registration.
120. The council receives a high level of repeat statutory declarations where the intended recipient of the Notice To Owner (NTO) challenges the receipt of said notice on a regular basis. These are now known as witness statements under the new legislation and are used where the intended recipient can claim that the NTO was not received which can restart the whole process at the NTO stage.
121. The workflow procedures for dealing with PCNs should be reviewed. For example, it was noted that dealing with mail and payments received in the post could be improved. Better workflow may result from the use of multiple post office box numbers instead of the current single box number, and logging all payments onto an Excel workbook while they go for processing at the Cashiers.
122. It was noted that the administration section does not use any workflow techniques, as they are not available within the current Gateway software. The procurement of a new IT system would address this issue, and the section should automate the ability to direct the various stages of processing. This would help to avoid items getting lost in processing, and critical dates being missed.
123. Scanning of documents does not currently take place for all correspondence received; only correspondence for a case reaching an appeal stage is scanned. The use of scanning should include all related documents, including for example, envelopes for proof of posting. When a single processing section is created, it is recommended that it would be appropriate to review the procedures for the use of document scanning. It may be for example, that if all scanned documents were available on the system, that the Contact Centre staff could have access to this and be able to answer simple questions like "has my letter been received?" without having to pass the call to the Parking Services administration team.
124. Many councils scan all PCN related documents at the point of mail opening to reduce manual handling. The documents are then automatically stored against the appropriate case record for anyone with access permission to view.
125. Parking Services staff print all documents for notices to owner etc, and envelope these documents. It is worth considering the purchase of equipment to automate the enveloping of such documents, if it is not available already within the council.
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126. A comprehensive list of procedures and processes and examples of current documentation, for the administration team was made available during the review. It is understood that this list and these documents are currently being made in to a procedure manual.
127. A full set of standard response letters, including agreed standard paragraphs for repeat items was made available during the review and these letters adequately perform the functions required. The letters have been updated to the requirements of the Traffic Management Act.
128. Standard documents within the new legislation such as the notice to owner, charge certificate, notice of rejection were in preparation during the review. For clarity and robustness these are to be based on the recommendations of the Local Authority Special Interest Group (LASIG), led by a QC.

Part D: Enforcement Service Provision

129. Since December 2007 the council has undertaken the majority of CPE as a result of bringing the service in-house from previous external service provision. This review looks at the current service to assess its robustness and does not attempt to make any statistical correlation with previous provisions.
130. The enforcement team structure comprises an enforcement manager, two senior civil enforcement officers (SCEOs) and 12 full time equivalent CEOs. At the time of the review the section had five vacancies and a recruitment process was in progress.
131. As a result of this, all statistical analysis is based on average outputs rather than total outputs which provide an indication of the full potential of the service when recruitment and training have been concluded and a full staffing level is achieved.
132. The council enforces all on and off street areas other than multi-storey car parks. Enforcement is by mobile or foot patrol and deployment is managed internally by an enforcement manager with the assistance of the two senior supervisors. This split in the enforcement provides a disjointed service and the PCNs issued on the multi storey car parks are hand written which then have to be manually inputted to the IT system. The Consultant recommends that the whole enforcement service should be brought back in house as soon as the current contract with NCP Services concludes.
133. Due to the current lack of resources available, the beats are structured such that only one mobile patrol is undertaken on a scooter, with the remaining deployment being on foot or by use of public transport. Pool cars are available should extra deployment be necessary. Public transport is free for CEOs when on duty and in uniform. When the resource is fully staffed the Consultant recommends that up to three more scooters should be obtained to allow quicker access to areas on the periphery of the city and to outlying districts.

134. The Consultant spent time with the whole of the enforcement team and accompanied three CEOs on live beats around the city to gain an insight in to the day-to-day routines and working practices of the enforcement team. All three CEOs conducted themselves in a very professional manner and dealt with members of the public politely and gave out good information where necessary. It was evident that the firm but fair policy of the council was being adhered to and that the motorist was given fair warning where possible of potential PCN issue. Two of the three officers were TUPE transfers from the previous service and both these officers were very forthright in saying how much better their working life was as a result of the change which is a credit to the council.
135. The Consultant interviewed all the daytime enforcement staff on duty at the time and despite a "Code Red" incident on the same day (see paragraph 144), morale among the team was very high. Minor areas of concern were expressed in frustration at not being able to enforce due to lack of remedial work in certain areas but this issue has been covered elsewhere in this report.
136. When Parking Services is fully resourced, additional evening patrols and more Sunday patrols will be deployed to give extra coverage to areas that are experiencing inconsiderate parking at these times.
137. At the time of the review the enforcement team operated from premises on Frederick Street and a recommendation of the report was to suggest that this is moved in to the civic centre to save cost and to make the whole parking service more accessible internally. This was completed in August 2008.
138. The senior supervisors have access to a small store of common signs and these are erected by the supervisors where signs are missing or vandalised. This is in agreement with the Traffic and Road Safety section and the Highways Maintenance section. Missing or poor lining is reported to the Traffic and Road Safety section, which in turn sends a request to the Highways Maintenance team to rectify the problem. This is not always prioritised, meaning enforcement in crucial areas is lacking while the remedial work is awaited. It is recommended that a method of prioritising repair work requests is introduced so that Category One requests will be within three days and range of maximum response times is also agreed for other categories. This should also apply to any signs that the enforcement team have to request through the Traffic and Road Safety section. There is no set procedure for this element of the service and this is reflected in the sometimes ad-hoc manner of dealing with missing signs and lines. This is covered in greater detail in Section 4, Part B, and e) 69-79 in this report.
139. The enforcement manager supplies a list of defective signs and lines to the Traffic and Road Safety section on a regular basis but receives no feedback on when remedial work has been undertaken. To allow better enforcement to take place the Consultant recommends that a process is invoked that requires reporting back on faults rectified, to the parking section.

140. It was also noted that there is a shortfall in knowledge on whether enforcement can be undertaken on certain types of TRO and clearer direction from management is required in this area especially where new legislation has been introduced. If a list could be produced electronically then this could be transferred to the hand-helds automatically to prevent the incorrect issue of PCNs where known.
141. Although the enforcement manager is responsible for the deployment of staff around the city, the current IT system does not allow the manager to access daily reports without having to ask NCP Services to provide the details. This inhibits the manager in the course of her daily functionality and it is recommended by the Consultant that the IT system is brought in house or a new one procured that enables the manger to manage effectively.
142. The radio controller also moved to the Civic Centre in August, which will help when cover is needed in the radio room. The radio controller is also the person who undertakes first line maintenance of the pay and display machines and responds to call outs from the site staff as soon as possible during the same working day. The radio controller also inputs the hand written PCNs that are issued in the multi storey car parks. The Consultant recommends that this latter function is passed to the parking section when the amalgamation of offices takes place.
143. During the review a “Code Red” emergency call was received from a CEO on site. The Consultant observed the whole scenario from receipt of the call through to the manner in which the member of staff was dealt with in the following days. The Consultant’s view is that a very professional manner was adopted throughout the ordeal and that all steps that could be taken to ensure the employee was cared for in the correct manner were taken. Further actions to minimise the impact on the service by debriefing and reassuring the remaining staff were well received. This incident is now part of an ongoing police investigation and cannot be commented upon further. It did however show that the steps in place to deal with such incidents are robust and accountable. The only fault noted was that the radio control room did not have a recording device so that the radio communication and subsequent conversations with the CEO were not recorded. The enforcement section has been recommended to rectify this as a matter of urgency by the Consultant.
144. First hand observations by the Consultant provided the opportunity to identify other minor improvements to the service:
- a) A unique numbering system should be introduced on the pay and display machines to allow easier recognition by maintenance staff and to allow the machine number to be printed on the pay and display tickets to prevent fraudulent use in other car parks.
 - b) Reporting of out of date tax discs appears to have fallen in to disrepute as a result of lack of response from the Driver and Vehicle Licensing Agency (DVLA). This issue needs to be raised at management level with a view to getting a firmer commitment from the DVLA.
 - c) The appeals card that CEOs hand out is very useful in controlling potentially aggressive situations and allows the CEO to leave a situation where conflict is likely.

The card would be improved if the helpline phone number is moved to the front of the card. Currently this number is in the middle of the 'ways to appeal' descriptions. It is not possible in legislation to appeal a PCN verbally so this could confuse the motorist and also increase the workload of the parking service unnecessarily.

- d) The council on-street CCTV cameras do not appear to be linked to the police control room. The CEOs would like this to be rectified if at all possible especially in the city centre. The Consultant agrees that this should be considered by Sunderland as part of the risk assessment of lone workers.

145. Statistics collected by the Consultant are included in Appendix D:

- a) 76% of all PCNs currently issued are in the South Sunderland TRO area which comprises beats A, B, C and D.
- b) Peak times for issue of PCNs are 09:00, 11:30, 14:00 and 15:00.
- c) PCN issue rates go down over the lunchtime period. This appears to be as a result of fewer staff on site over this period. When the service is fully staffed it is expected that full coverage will be possible over this period and a more stable PCN issue graph will be the result.
- d) The CEOs that work most shifts, on average issue more PCNs per shift than those who work part time or on a lesser shift pattern. This is based on the PCN issued per hour worked rate which is the best indicator of working practices. As each CEO works the beats on a random basis it is recommended that this situation be monitored and variances addressed if they re occur. This monitoring may not be fully possible with the current IT system set up as alluded to above regarding reporting of the service.
- e) For the first 6 months of 2008, 1,254 PCNs were issued off street and 4,270 PCNs were issued on street. It is noted that issue rates dropped significantly in April when staffing was at its lowest. Since April the issue rates have increased as more employees are taken on. This suggests that the motorist is still willing to park illegally and risk a PCN when they feel that enforcement is not undertaken. It is therefore commendable that the council is taking on more staff to cover the gaps in the service to provide a consistent approach across the city. Evening observations on the coast road and in particular Seaburn by the Consultant revealed a very high proportion of vehicles parking illegally on double yellow lines after the 6pm timeline. As the service is predominantly a traffic management tool, and if it is felt that these lines are appropriate, it is strongly recommended that evening patrols figure high in the list of priorities when the resources permit.
- f) There should be a closer correlation between reviews of the appropriateness of restrictions and the levels of enforcement in different parts of the council area.

146. Overall the enforcement service is coming to terms with the new set up and when employees are recruited to fill the vacancies the service provision will become more robust and effective. Current employees are happy in their work and are very capable of maintaining a good working relationship with the public at large. The main issues that this review would have highlighted would be the separate office locations for the manager and the site team and the separate functions using NCP Services for the multi storey car parks. The first issue is already covered by the recent amalgamation of the

offices. The other in bringing together all of the elements of the service at the conclusion of the current NCP Services contract is one that needs addressing in the near future to ensure that a seamless transfer takes place in 2010. Other minor recommendations are made below that will also help improve the service.

Part E: Cash Receipting and Call Centre

147. The Contact Centre has a limited role currently in the support of the parking function. The Consultant is of the view that this role could be widened and expanded. Indeed, the role of the Contact Centre in parking has never been defined, and it deals with parking related issues by default, rather than as part of a planned transition of contact functions. Partly as a consequence of this, the Contact Centre is not aware of what proportion of their workload relates to the parking function. It can only document their use in taking parking payments. It has no budget for dealing with parking matters, and the Contact Centre management is not aware for example, that the number of staff on patrol is about to rise to fill vacancies and this may in turn affect the volume of PCNs issued. Parking payments are however, the second largest volume by type handled by the Contact Centre.
148. Better integration of the Contact Centre into the mainstream parking activities is recommended by the Consultant.
149. Staff at the Contact Centre do not use “customer relationship management”(CRM) software to guide their interaction with the public. It is however, planned to do so, and this will help the development of the parking related service. If for example, a member of the public rings and asks a question relating to the availability of disabled parking in off-street car parks and the council policy on charging for this, the staff have to use the council website to answer the question. Better software would help them to structure possible areas of information, and to guide the access to relevant information. It was also noted that the council website is less than comprehensive in terms of providing parking related information.
150. The major area where the Contract Centre should be improved is the means of accepting payments from members of the public willing to pay for PCNs. The payment receipting system is old, and lacks integration to and from the PCN database. A PCN balance changes with time, as it passes critical dates, and stages in processing. That makes it particularly important that Contact Centre staff are able to establish the current value of any PCN. As they cannot currently do this, they can only accept a payment as offered by the payee. So if a PCN is issued with a face value of £70 and with a £35 discount level of payment by a certain date, a payment can easily be taken at the wrong value. This then requires further processing work to collect the outstanding balance, which in turn is likely to irritate the payee, and make collection more costly and slower. The Consultant recommends that the Contact Centre payment system is made aware of the balance due and ask for that amount when a payment is offered. This principle applies to all points where payment can be taken when the payee is available, including

personal payments, internet payments, and automatic telephone payments, as well as Contact Centre payments.

151. To do so, the cash receipting system for the council must be either capable of holding a file of PCN outstanding balances, say as of midnight the previous night, or of being on-line to the PCN processing system. A decision needs to be taken as to how this will be achieved, and the necessary provisions built into the on-going procurement for a new cash receipting system, and the new PCN processing system described below. It is understood that the current cash receipting system is capable of holding such balances; it has never been set up to do so for parking payments. Given that a new system is now being procured, it is probably sensible to leave this integration until that new system is in place, but the specification for the new cash receipting system must take this requirement into consideration.
152. The Contact Centre should also be aware of when a vehicle has multiple PCNs outstanding. When a payee contacts them regarding a PCN payment, if staff are aware that further PCNs are outstanding, they can ask for a payment to cover several PCNs, and close all such cases at the same transaction. This technique works in other councils, but the staff have to have suitable systems and access to data to enable them to do so.
153. The cash receipting system used by the Contact Centre staff has a number of serious shortcomings, which are being addressed in the specification for the new system. There is for example, no checking of check digits on the PCN number, which means that a feature to avoid errors is not being used. The system cannot link directly to a bank system for processing credit and debit card details –staff have to use manual handsets to re-enter data. Also, as the system is not designed for PCN processing, simple things like having to enter the vehicle registration number in a field usually used for a caller's names seems less effective.
154. The new cash receipting system must be specified to allow on-line payment of PCNs. The current Alliance and Leicester system offered by the council is not designed to accept PCN payments. Most councils now offer this on their own cash receipting facilities, and it has the benefits of allowing payment to be made at any time of day or night, and it avoids what is often a heated interaction when a payment is being taken by voice telephone. Such payment systems must show the current balance of a PCN, which again, is not currently available. On-line payment sites now also enable councils to show the photographs taken at the scene of the contravention to a payee, which often means that a case is closed earlier and without discussion with a member of council staff.
155. Better cash receipting integration would also enable staff in the parking administration office to take payments at the end of any conversation with a person in receipt of a PCN, something they cannot do at present. At present, callers are put back through to the Contact Centre for a payment to be taken. Giving parking admin staff access to an on-line payment function from the cash receipting system which is in turn on-line to their

own PCN system would mean that payments would be a single transaction with a simpler, quicker service to the public.

Part F: IT review

156. The current service for information about PCNs is managed remotely by NCP Services. The service uses one of the specialist PCN processing systems on the market. This system is in common use across councils, and is known to be fit for purpose.
157. The contract for the provision of this service ends in February 2010 and the Consultant is of the view that planning for the replacement of this service should commence shortly.
158. The service delivered by NCP Services is considered by the Consultant to be costly in comparison to similar systems on the market and reports made available to the Consultant appear to show that this service costs approximately £50,000 per annum. This is expensive compared to the costs of procuring a system by competitive tender. Using estimates of prices likely to be tendered in such circumstances, the Consultants believe that the council could procure the outright ownership of a suitable system for approximately £75,000, with a recurring charge of around £15,000 per annum for licences and support. Over a five-year term, this would represent a potential saving in cost of £100,000.
159. A decision to bring the IT service in-house would imply having to procure a new system by open tender, in order to meet the requirements of the procurement procedures rules. Procuring a new system would require a timescale of around 9 months to a year, plus the inevitable "bedding in" period that a new system would require. The Consultant recommends that procurement should therefore commence no later than the end of 2008, using open tendering procedures, with a view to having the new system in place and tested and functioning by the beginning of 2010.
160. The current system is not fully web enabled, which restricts access to a limited set of locations; procuring a fully web enabled system that does not required software systems such as Citrix would provide greater flexibility to access the PCN data.
161. It is noted that the council owns the CEO hand held computers, so these may not need replacing at the end of the NCP Services contract depending on their functionality at that time. This is an issue for the IT procurement specification.
162. Given the projected costs of a new system, the European Union (EU) procurement threshold would not be reached, but it may be considered sensible to go though the full EU procurement process using the restricted procedure, to avoid having to re-start if the tendered costs come in near the threshold. A spreadsheet giving estimated costs of procuring a new IT system is provided as Appendix E.
163. Should the current supplier not win the replacement contract, it should be noted that

data conversion between the PCN systems on the market is no longer a major obstacle to changing supplier that it once was. A large Unitary Authority in the South of England converted from the Gateway system to a significantly lower cost alternative relatively easily, when they implemented DPE in 2007. It is recommended that council officers visit such a location to assure themselves of the capability of other systems on the market, and the ability of suppliers to convert databases.

164. Procurement would also have to take place for the terminals, printers and scanners required by staff, as these are currently owned by NCP Services. It was noted that parking administrative staff have 2 screens, one for the NCP Services access and one for accessing the council systems, such as email. This is inefficient. Taking the system in house would dispense with this and it is therefore recommended by the Consultant.
165. Procurement documents are readily available, as this is an area where many councils have procured such systems through open tender in the recent past. The Consultant would be pleased to provide the council with a suitable set of documents at an appropriate juncture.
166. The current method of remote access to the data limits the abilities of the parking service staff. The Consultant requested data relating to PCNs from the council and it was noted the difficulties that council staff had in getting access to the requested information in the appropriate format. This is not normally the case, and bringing the PCN software in-house would improve the access.
167. The speed of remote access also appears to be an issue for the PCN staff, who have on occasion, a poor response at their screens. This should never be the case, as it wastes staff time, and may cause a poor response to customer queries. Having remote access also appears to make integration of the PCN processing system to other council systems difficult, if not impossible. Again, this is hampering the development of the parking service. Full integration with cash receipting and Contact Centre functions is considered essential for a modern, integrated service. Bringing the service back in-house would enable the council to address these issues.
168. The number of PCNs issued currently by the council is relatively small for an area the size of Sunderland. Casual observation by the Consultant showed that there are still a significant number of contraventions that are not being enforced because of lack of resources. Even a small rise in ticket issue would still give a total that is modest in comparison to other councils, and is only about two-thirds of the number that has been issued in Sunderland historically. The technology required to be put in place to manage this volume need not be as sophisticated as in other sites.
169. The council currently only has very limited need for the issuing of parking related permits. However, it is understood that this may increase in the future depending upon the response to requests for resident parking schemes. The current IT contract does not offer a permit processing module to the council, although it is known that the system does have one available. The procurement of a new system should include this in the

specification, and if done so at this stage, The Consultant believes it will be offered at no marginal costs which would effectively be a saving against the procurement costs of a new system.

170. It would assist PCN processing staff if details of pay and display machine breakdowns were capable of being transferred and stored in the PCN processing software. This facility should be incorporated into the specification for the new PCN software system.
171. The current council parking website is poor in terms of accessibility to information in that it contains only two references to parking. One is how to apply for a permit and the other is the 'parking charter' dated January 2008 which is now outdated by the introduction of the Traffic Management Act 2004 in March 2008.

Part G: Finance

172. Financial controls in respect of the parking service were not part of this review as they have been dealt with elsewhere and as such the comments below have only been made where financial implications of this report impinge on the review.
173. The funding of signs and lines maintenance is without doubt one of the more contentious issues across authorities in England and Wales with the main point being that the funds made available are rarely sufficient to keep on top of the repairs and standard maintenance required annually. The current annual funding allocation is set at £60,000 for the whole of signs and lines maintenance including CPE repairs and this includes white line replacements. This is further supplemented by the minimal budget for the replacement of small signs, which is held by Parking Services for those signs related directly to the enforcement service. Officers stated that a further £60,000 annually is required to make good the initial backlog and to maintain the signs and lines. This is an invest-to-save scenario. If the signs and lines are in good order then PCNs can be issued legitimately against drivers contravening the TRO. Inadequate maintenance will lead to the service coming in to disrepute as more appeals are made against inadequate signs and lines. It is recommended by the Consultant that an increase in budget provision is considered for the signs and lines related to parking enforcement. It is understood that the allocation of funding for the maintenance of lines and signs comes from an overall Highways Maintenance budget of £3,120,731 for 2008/2009. Clearly, one option is to give greater priority, and therefore more resources, from within this overall allocation for Highways Maintenance.
174. It was noted during the review that 'write offs' of the PCNs are checked and authorised by the Treasurer's Department prior to confirming this on the IT system. This is best practice in terms of independent auditing and confirms the commitment of the council to ensure a fair system is in place.
175. Debt collection is through use of in-house bailiffs for Sunderland postcodes and two external companies for the remainder. Again this is industry recognised as good

practice. Collection rates of around 20% are equal to the national average. Elsewhere some authorities pass on the warrants between bailiffs if the first one was unable to collect the debt. The council does not adopt this practice and the Consultant's view is that for a very small extra return the system just puts more unnecessary pressure on the public and the Consultant supports the council in not adopting this process.

176. Cash collection and counting is undertaken by NCP Services on behalf of the council. There are inevitably delays in this process between monies being collected and the funds reaching the council account. The system is disjointed in that two parties are in the loop and audit trails are difficult in the event of any cash anomalies appearing. It is recommended that the whole process is brought back in house when the current contract ends. This would also allow the lease to lapse on the current property where the counting is undertaken which can go as a saving against the collection service as a whole.
177. The council is one of only three authorities in England and Wales that have chosen the Band 1 level for the PCNs, i.e. the £40/£60 level as opposed to the £50/£70 level (Band 2). All financial profiles produced elsewhere by the Consultant show that the Band 1 level is not sustainable in terms of covering the cost of the service provision as a whole and is out of line with the remainder of the authorities in the north east. The lower level chosen is not considered to be an adequate deterrent when a PCN can be paid off at just £20 against a daily charge of £7 in the on street pay and display. The Consultant recommends that the council reviews this decision.
178. A look at the recent figures reveals that only 14 no contests were registered in the first 6 months of 2008. This is a very low number against the total of 5,520 PCNs issued in that time band. This is a further reflection of the quality of the PCNs issued by the council.

Part H: Legal Processes

179. Legal Services is responsible for the writing of the preambles to the on street TROs and off street parking places orders and the promoting of same in the due legal process. This method of writing of the Orders is undertaken in conjunction with the Traffic and Road Safety section and is described elsewhere in this report.
180. The legal content and the making of the Orders is based upon the 1984 Road Traffic Act as the primary legislation. Contraventions to the Orders are covered by the Traffic Management Act 2004, although it is not necessary to state this in the legal orders and is actually discouraged by the DfT. The method of enforcement is not required in the order. Although not necessary it can be construed as good practice to include an article to say that penalty charges will be incurred when parked in contravention of the order.
181. Legal Services is currently reviewing the method of writing the Orders during the latest upgrade to the orders. The Consultant would strongly recommend the adoption of plans

to act as schedules to the orders rather than text as was the common method previously. Authorities that have adopted this method have found that they are able to put the maps on their websites allowing the public to easily access the information thus reducing queries to the council and in particular Parking Service. Maps are also an effective way of improving the interpretation of orders as they reduce ambiguities inherent in text schedules. As the council already has a map based system this would be relatively simple and cost effective to adopt. It is recommended that this process be adopted on completion of the current round of TRO upgrades to prevent any delays to the order making process.

182. It is apparent to the Consultant that a common TRO flowchart is required to enable the process to be recorded and responsibilities to be accepted, correctly from start to finish. The Traffic and Road Safety section and Legal Services have developed a spreadsheet that can be used alongside the flowchart to note progress and to ensure the passage of an Order through the system is logged and progressed.
183. Legal Services is also responsible for the advertising of PCN levels and if a change to the band level as recommended in the previous section is adopted this will be required in the short to medium term.
184. CPE using mapped schedules usually results in the legal section having minimal input other than the writing of Orders, which makes the system more streamlined and easier to manage.
185. Mapped schedules also accord with e-government in that they can be put on the web site and accessed by the public as required.

Part I: Review of Action Plan and comments on the Business Process Re-engineering work

Review of Action Plan

186. Appendix F (ii) contains a modified Action Plan including comments from the Consultant.
187. The Consultant has based comments for this review on the Action Plan dated 12th May 2008 elements of which may have been superseded by ongoing work in progress.
188. The addition of the comments/suggestion column is to highlight those areas where the review identified items that require updating or progress clarifying.
189. Some items have been described as complete in the May review of the Action Plan. Although the majority of the elements of these items are completed, it has been clarified in Appendix F (ii) by the Consultant where further work would be beneficial.

190. It is clear that a lot of work has been undertaken against the original action plan. This review has identified areas where processes require completion and the Consultant will discuss these with the council in order to progress these items.

Comments on the Business Process Re-engineering work

191. This review has been undertaken in parallel with a Business Process Re-engineering (BPR) review for the Traffic and Road Safety section undertaken in-house. The Consultant has been asked to take that work in to account in producing this report, and to comment on the work so far so that it can be fed into further BPR work.
192. The differences need to be clarified and are summarised as follows:
- The BPR covers the work of the whole Traffic and Road Safety section. The Consultant's work only covers those parts of the Traffic and Road Safety section that directly affect the operation of parking enforcement. Thus they exclude issues such as road safety, and non-parking elements of scheme prioritisation, design and implementation.
 - The Consultant's work covers the links between other sections, such as parking and legal and highways maintenance. The BPR does not do this, indeed it was specifically designed to exclude enforcement.
 - The BPR is taking a very detailed look at the processes within the section. The Consultant has therefore not done this, but have fed our comments into the work so far.
193. The Consultant considers that the general scope and direction of the BPR work is appropriate and has a number of specific comments to make which are reported in Appendix F(i). The Consultant recommends that another meeting is held with the leader of the BPR process to explain the comments in more detail. The Consultant also recommends that it is asked to review progress in about six month's time.

End of main report