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SUMMARY

The Road Traffic Act 1991 has put a question mark over the future of parking enforcement by the police service. It allows the transfer of responsibility for policing yellow lines from the Metropolitan Police to the London boroughs, although the newly designated 'red routes' and some other main roads will remain the responsibility of the police. The boroughs will also acquire stronger powers to enforce their own parking meter and residents' bays schemes. The Act allows for the extension of this regime to other parts of the country. Provincial police authorities, forces and highways authorities need to consider whether they would welcome this transfer of functions; and if highways authorities apply, the government will have to decide whether to approve it.

The new legislation was inspired by problems in London, but a number also occur in provincial forces:

- the lack, in traditional police management systems, of quantified service standards as a basis for decisions on budgets, resource allocation, and performance aims; and

- the failure to integrate policies on the promulgation of parking restrictions by highways authorities with policies on enforcing them by police authorities.

The last point ought not to be a major problem in the provinces, where the police authority is often a committee of the county council which is also the highways authority, but it seems common for yellow lines to be imposed without regard for the ability of the police to enforce them; and highways departments tend not to complain to police forces about standards of compliance by motorists.

Objectives for parking enforcement are vague and unquantified. Performance review is perfunctory, and day-to-day management is often languid. There is little popular pressure for a more active approach to enforcement.

Traffic warden strength is usually based on historical decisions and not justified by standards of service or the economies of substituting wardens for police officers.
The Commission recommends that:

- highways authorities should liaise closely with their police authority and force about the compliance levels needed to achieve their traffic management objectives, about the type of regulations, and the number of them. They should review their schemes to ensure that relations meet their purpose, and that those purposes remain relevant to changing traffic patterns;

- there should be quantified objectives for parking enforcement based on aims for levels of compliance with parking regulations;

- these should be agreed between police authorities and forces together with guidance on the style of enforcement, as a standard of service;

- police authorities should ensure that decisions on numbers of traffic wardens are related to the workload of meeting the service standard for parking enforcement and the substitutability of wardens for police officers; and

- local police managers should give more attention to meeting delegated objectives for parking enforcement.

For the longer term there is no universally compelling case for police forces to retain responsibility for parking enforcement. But if local authorities take over, they should have clear traffic management aims, so that income generated from penalties is seen as a way of financing traffic policies to meet those aims, rather than as an end in itself. The recommendations for better management in this paper apply equally to police forces and highways authorities carrying out parking enforcement.

**Box A**

**Categories OF PARKING RESTRICTIONS**

Restricted parking refers to regulations on waiting, loading, unloading and parking on yellow lines, etc which are currently the responsibility of the police. Mostly they are made to keep thoroughfares clear, so that traffic flows freely and accidents are reduced. They are often also made to control access.

‘Controlled parking’ refers to designated parking spaces on the road. They are sometimes free for occupation, but with a limit on the duration of stay. Often a charge is made for occupying them. The commonest forms of controlled parking are metered spaces and residents bays. Increasing use is made of pay and display and voucher schemes which have the same effect of rationing the use of road spaces for which there is excess demand, and raising income for the highways authority.

**INTRODUCTION**

1. Almost all aspects of daily life depend on transport directly or indirectly, mostly by road. Careless parking can cause congestion and accidents to other road users, including emergency services, out of all proportion to benefits to individual offenders. The Department of Transport estimated in 1986 that improved compliance with parking regulations would save up to £200 million in congestion and accident costs in London alone, and journey times would be reduced by 10 per cent. The position is thought to have worsened since then. Parking regulations and their enforcement are therefore of considerable importance to the well-being of individual and the economy generally.

**PARKNG REGULATIONS**

2. Currently breaches of restricted parking (see Box A) are criminal offences, which can be dealt with by the police by way of a fixed penalty. On receipt of the fixed penalty notice, if the accused admits the offence and pays the penalty there is a summary conviction without the need for a court appearance. In 1990 there were 6.3 million fixed penalty traffic crimes, more than the total of ‘notifiable’ crimes included in published crime statistics.

3. Most parking offences, 5.7 million of them in 1990, are ‘non-endorsable’ – they have no bearing on qualification to hold a driving licence, and if the fine is paid, currently £16, that is the end of the matter. Most non-endorsable penalties issued when the driver is absent are not paid within the 28 day period specified. Only about 30 per cent are paid in that time; a further 40 per cent are paid late. Some of the notices issued are written off, either by the force or on being dismissed by magistrates; but about 20 per cent are registered with the courts as fines because of non-payment. The penalty income of some £60 million a year goes to central government, rather than being applied locally towards enforcement costs.

4. Controlled parking (see Box A) is different. Parking at a meter which has gone into ‘excess charge’ is not a criminal matter. The debt is to the highways authority which has desig-
nated the space and set the charge for it, and local authorities can employ their own parking attendants to patrol these spaces and issue notices requiring the extra payment, which are enforceable through the courts.

5 But their powers are limited. If no payment has been made initially, or if the stay has gone beyond the excess charge period into penalty, only the police can issue fixed penalty notices for them. A local authority parking attendant can only issue a ‘Notice of Intention to Prosecute’ (NIP) in these cases, which has none of the advantages of the fixed penalty procedure: it requires court time, which may be in short supply, and it is an administratively clumsy procedure for the authority.

6 For this reason many authorities with controlled parking schemes currently use the police to patrol them, issuing fixed penalties or excess charge notices as appropriate. The police are entitled to charge for this service, but even so it is usually financially advantageous to the highways authority or its agent the better enforcement which usually results promotes income from legitimate use of the spaces as well as from excess charges.

TRAFFIC WARDENS

7 To assist police officers with parking enforcement and some other aspects of traffic regulation, traffic wardens were introduced to the police service in 1960 - first in the Metropolitan Police and, in the following decade, in all provincial forces. There are currently some 4,800 traffic wardens in England and Wales. They are not a large part of the police service, which has some 193,000 police officers and civilian personnel (Exhibit 1). But their employment costs come to about £50 million a year. Here, as in all areas of the police service, it is important to secure value for money.

8 Traffic wardens do not work exclusively on parking enforcement, but all their duties would otherwise fall to police officers (Box B). The Home Office does not limit the number of traffic wardens which a local police authority may employ as it does the number of police officers (see Police Paper No 6) and their costs attract a 51 per cent Home Office grant. Police authorities should take a keen interest

Exhibit 1

POLICE SERVICE PERSONNEL

Traffic wardens amount for 2.5% of the total...

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<tr>
<td>Civilians 24.2%</td>
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<tr>
<td>Traffic Wardens 2.5% (4,800)</td>
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<tr>
<td>Police Officers 65.3%</td>
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<td>Special Constables 8.0%</td>
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Source: CIPFA Police Statistics 1991, for all forces in England & Wales

Traffic wardens may enforce the law in respect of offences concerning a vehicle:
- left of parked on a road during the hours of darkness;
- waiting, being left of parked, being loaded or unloaded in a road or other public place
- contravening provisions of the vehicle (Excise) Act 1971
- committing an offence relating to parking places on highways where charges are made

They can issue fixed penalties for offences which are non-endorsable (i.e. those where the fixed penalty does not involve driving licence endorsement), with the exception of offences of obstruction and leaving a vehicle in a dangerous position.

They can act as school crossing patrols, and they can also be used in the custody of vehicles towed away to pounds. They may also discharge other functions normally undertaken by police constables concerning regulation of pedestrians or vehicle traffic (e.g. assisting with crowd control and fixed point traffic duties).

They are employed by the local police authority but under the direction of the chief constable. The chief constable determines which of the ranges of permissible functions his traffic wardens undertake.
in making the maximum efficient use of traffic wardens, since the consequences of not doing so are either that standards for their services will fall, or that police officers will spend time carrying them out instead, depriving other police functions of attention.

9 Wardens, with their limited duties and the more limited skills necessary to carry them out, are cheaper to employ than police officers. The cost of a warden is only about one third that of a police constable (Exhibit 2). If all the wardens currently employed were replaced by police officers, some £80 million would be added to the annual police bill. A failure to substitute a warden for a police officer is a missed opportunity for a financial saving.

10 The existing pattern of deployment of wardens is difficult to explain or justify. There are wide variations amongst forces in the numbers of traffic wardens per police officer which are not explicable by the types of area which forces police (Exhibit 3). Population density might be taken as a crude index of the need for traffic wardens, but there is no correlation with traffic warden strength (Exhibit 4). Statistics on obstruction, waiting and parking offences (almost all in categories which wardens can deal with) show that the number of offences penalised per warden varies by a factor of 4:1 (Exhibit 5). Of course, these variations might reflect outcomes of careful management decisions in the differing local circumstances of each force on how best to deliver locally specified standards of parking enforcement, and how best to use traffic wardens in the process. But this is not the case.

11 Across the country, 21 out of 41 provincial forces reduced traffic warden strength between 1980 and 1990, despite Home Office encouragement for civilianisation (Exhibit 6, overleaf). In one case strength fell by 46 per cent. Over the period, road usage has increased and parking restrictions have multiplied. These reductions did not reflect conscious decisions to deliver lower standards of parking enforcement. It is probable that in almost all cases standards did fall, although not in a planned or organised way, but in many cases there may also have been extra work for police officers.

12 The proportions of penalties issued by police officers for offences with which wardens can deal vary widely
And in some cases that proportion has been rising, reflecting the trends in traffic warden strength described above.

PRESSURE FOR CHANGE

Perceived weaknesses in police management of parking enforcement, and the low priority which it is given in police resource allocation, have led to pressure for it to be transferred to highways authorities. Most of this pressure has come from London boroughs. The Road Traffic Act 1991 gives the government powers to make this transfer of functions in designated areas. This is focusing attention on the subject in the police service. Whilst it is expected that there will London, with Metropolitan Police support, the prospects are less clear in the provinces.

* * *

The Commission has studied parking enforcement in detail in nine police authorities, and has discussed the issues with a number of other forces and bodies with an interest in this area. This paper assesses the effectiveness of the service now provided by provincial forces and sets out ways in which it can be improved. Against that background police and highways authorities will be able to reach more informed decisions about the best way forward in their areas.

WEAKNESSES IN PARKING ENFORCEMENT

Management of parking enforcement amongst provincial forces displays varying degrees of neglect, compounded by incoherent decision-making in local government. Specifically:

- the aims of traffic regulations are not always clear, and the regulations are not kept under review to ensure that they remain useful;

- there are no clear operational objectives or performance measures, and performance review of parking enforcement and traffic wardens is usually perfunctory;

- decisions on the numbers of traffic wardens are taken without proper consideration for standards of parking enforcement; and
general supervision of wardens as they go about their duties tends to be languid.

Not all of these comments apply to all forces but in the nine forces studied in depth by the Commission these weaknesses are all apparent to some degree. The following sections explain these problems with examples found in the study.

THE AIMS OF REGULATIONS

Parking regulations are made by highways authorities. For motorways and other trunk roads the highways authority is the Department of Transport in England and the Welsh Office in Wales, but they usually appoint local authorities as their agents. For other roads the highways authority is the local metropolitan district council, London borough or county council, depending on the area. County councils may by mutual consent delegate their powers to district councils through agency agreements.

In theory, regulations can be appraised to identify the benefit they bring to some parts of society against their adverse impact on others. Prohibiting parking on a narrow, busy street may well reduce congestion and accidents. But regulations in one street may have knock-on effects on traffic patterns elsewhere. Shops may be affected if they rely on 'fly-parking' customers, and local people may be inconvenienced. Trip restraint or trip redestination may be a deliberate or unintentional effect of parking regulations – instead of making the same journeys but parking further away from the eventual destination, people may use public transport, or switch leisure and shopping, or even work, to other places, or simply make fewer trips.

Capturing all this is difficult. For major traffic schemes it is usually done, but for decisions about whether to put in a stretch of yellow line, or designate a few controlled spaces, the approach is necessarily localised, rougher and more subjective. The Department of Transport has suggested that more rigour in these local decisions should be beneficial to traffic policies, and that more attention should be given to reviewing the effect of regulations after they have been implemented. In a recent report on urban traffic congestion, the National Economic Development Council has also called for reviews by highways authorities and the police to remove unnecessary yellow lines, to consider needs for legitimate parking, and to

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Exhibit 6
CHANGES IN TRAFFIC WARDEN STRENGTH 1980 – 1990
Half of provincial forces have reduced warden strength over the last decade...

Source: CIPFA statistics; excludes Metropolitan Police and City of London Police

Exhibit 7
PERCENTAGE OF TICKETS ISSUED BY POLICE OFFICERS
The percentage of non-endorsable fixed penalty notices issued by police officers instead of wardens varies widely...

Source: Audit Commission analysis of a sample of forces, 1990
improve enforcement of useful restrictions. *

20 The Commission agrees. Highways authorities often simply do not know to what extent their highways are the subject of restrictions. They operate incrementally, adding new restrictions as the need arises, but rarely removing older ones which may have outlived their usefulness. Where reviews are carried out, they may identify regulations which have been made redundant or inappropriate by changing traffic patterns, and they may lead to changes in policy on types of regulations.

21 Typically, police forces state their aims as 'maintaining the free flow of traffic, preventing accidents and enforcing the law'. They do not tend to see their role primarily as securing compliance with the regulations of the highways authority, which may themselves be aimed at accident prevention and maintenance of free flows of traffic. The police have two objections to this approach. Firstly, they are not prepared to take on trust that all the regulations which exist are worth enforcing. Anecdotes abound about authorities which fail to review existing regulations before making new ones, and which maintain regulations which make little sense. Secondly, they complain that they do not have the necessary resources to enforce them all.

22 The upshot is that the police draw up their own hierarchy of regulations which deserve rigorous enforcement, and those which do not. They may attach a very low priority to regulations which they see as concerned primarily with amenity values or with local authority income, unless they are specifically paid to enforce them by the highways authority. Even then, forces sometimes see the resulting allocation of resources as inappropriate, and there may be a tendency for enforcement to drift towards what the police see as higher priority tasks.

23 A further problem is that the relationship between enforcement activity and levels of compliance is difficult to determine. It can be influenced by a variety of local factors (Exhibit 8), and

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Exhibit 8
DETERMINANTS OF PARKING BEHAVIOUR

Enforcement is only one factor influencing drivers' decisions on illegal parking...

Source: Cranfield Institute of Technology
it depends upon drivers' perceptions of those factors. Research evidence is scant, but it points away from linear relationships between enforcement and compliance. There may be 'catastrophe effects': if enforcement is perceived to be very low, drivers may adopt more anarchic behaviour which will require a very strong enforcement effort to be reformed. Disregard for regulations seems to be commoner in London than elsewhere (Exhibit 9), which may be related to the common practice of business travellers reclaiming parking penalties from their employer.

24 Nevertheless, a relationship between enforcement and compliance exists. If the police were given achievable compliance aims by highways authorities, there would be something to direct their enforcement activity towards achieving the authority's traffic management objectives, and a way of measuring their effectiveness. But surveys of compliance by highways authorities have not been widely conducted outside London, and neither is there evidence in forces studied by the Commission of formal complaints from highways authorities about police enforcement of their parking regulations, as there has been in London. Highways authorities may be unaware of the real position and, where they are, they may be wary of formally complaining about it to the police authority, which is often constituted as a committee of the local county council.

SETTING OPERATIONAL OBJECTIVES

25 Contrary to popular mythology, police traffic wardens are not encouraged to see their job as writing tickets (Exhibit 10). There is a consensus amongst police managers that levels of ticket issues are not a reliable indicator of the content of wardens' jobs. As one force put it in an internal review: 'Measurement of efficiency and effectiveness must be related to the achievement of identified objectives. If these are the free flow of traffic, prevention of accidents and effective law enforcement, it is obvious that the number of tickets issued should not be the primary measurement of performance.'

26 A number of factors can influence the number of ticket issues. One is the level of parking compliance: the higher it is, the more effective the enforcement but the lower, accordingly, the opportunities (and need) for penalties. Another is the style of enforcement. There is a spectrum of different styles (Exhibit 11). At one end, a breach is a breach and should be penalised. Drivers should know how to recognise a restricted or con-
trolled space, and they should expect to be penalised for unlawful occupation unless there are mitigating circumstances, which can be raised with the enforcement authority or in court. They can become accustomed to this kind of ticketing and adjust their behaviour accordingly. Enforcement officers can then concentrate on ticketing.

27 At the other end of the spectrum, issuing a penalty is seen as a last resort, and a lenient view is taken of excuses for breaches. This is consistent with enforcement officers observing vehicles for some minutes (in many forces the guideline lies between five and ten minutes) before writing a ticket, which means that they are tied down to smaller areas and do more work before a penalty is given. Wardens in the vicinity are an incentive for offenders to curtail illegal acts. In these circumstances penalty issues become less reliable as an indicator of performance.

28 Some forces may lean more in their intended policy towards one end of the spectrum than others, and lax management means that the intended policy may not be reflected in uniform practices. For example, it is observable in some places that different wardens assigned the same beat at the same time of day as part of their rotation of shifts will consistently issue more tickets than others (Exhibit 12, overleaf). Whilst some of the low ticket issues may reflect a lack of devotion to duty taking advantage of lax management, much of the variation can be traced to the individuals' perceptions of how those duties should be carried out. Some wardens will be much readier to write tickets than others. Whilst some forces monitor ticket issues per warden they do not seem to have any clear view on what the data might signify. Other forces do not monitor ticket issues per warden or per beat.

29 Forces vary in their approach to complaints about tickets, partly in response to their perceptions of different attitudes amongst local magistrates.
Where the expectation is that magistrates will take a lenient view of excuses from drivers who go to court rather than paying the fixed penalty, the force may write off virtually all the tickets about which complaints and excuses are received. Tickets may also have to be written off if they contain errors, or if the Driver and Vehicle Licensing Authority is unable to supply information about the owner of the vehicle at the time. The proportion of non-endorsable penalties written off by forces outside London varies from 3 per cent to 13 per cent.

**PERFORMANCE MEASUREMENT**

30 Most people would nominate free traffic flow as the main objective of parking enforcement. But it is difficult to measure, and it would be unfair to hold traffic wardens or police officers solely to account for it. Achievement will reflect a range of factors beyond police control. The police may only make a contribution towards it, which can be swamped by other influences such as a growing volume of traffic or poor traffic planning. So it is not appropriate as an operational performance measure.

31 But a measure is needed, and it is unfortunate that in 30 years the police service has not adopted one. The obvious candidate would be the level of compliance with parking regulations, which the police can influence, and which is a proxy for one contribution which they can make to free traffic flow and accident prevention. Surveys can identify the proportion of parking acts in an area which are illegal, the duration of illegal parking acts, and the proportion of them which are penalised. But amongst forces studied, none conducted their own surveys or had access to data on compliance levels from other sources.

32 No activity analysis is undertaken to interpret data on ticket issues; for example, to understand whether low ticket issues are typically associated with a lot of advice and assistance to motorists, which has averted illegal parking. Traffic wardens do not note every encounter they have with members of the public, and it would be unnecessarily bureaucratic for them to do so, but neither are there ad hoc activity surveys to find out what they are doing with their time. Their achievement of operational objectives is not measured; and neither is their activity.

33 Some encouraging work has already been done by the Quality of Service Sub-Committee of the Association of Chief Police Officers in developing performance indicators of traffic management generally. That work, set in the context of the Citizen’s Charter provisions of the Local Government Bill, may result in the development of a more robust performance measurement framework over the next year.

**RESOURCES**

34 Decisions about numbers of traffic wardens are almost always described as 'historically' based, which sometimes means that nobody can remember the reason for it, sometimes means that the people who can remember the decision couldn’t understand it at the time, and always means that nobody currently wishes to justify it.

35 One force studied has not reviewed its traffic warden establishment since 1968. Another force set off in 1969 on the sound footing of soliciting bids from its territorial sub-units for the number of wardens each believed it needed, which were assessed and converted into a formula, implying roughly one warden for every 1,000 yards of restriction. The resulting establishment was endorsed by the police authority, but it was considered...
The number of posts authorised in the budget was set lower. Four times over the next decade the force recalculated the establishment in line with growth in restricted mileage, but whilst by 1979 the figure indicated by the formula had topped 300 posts, finance had never been allocated for more than 100 posts. At that point the force gave up adjusting the notional establishment, which has thus been unchanged for twelve years. The number of posts authorised has since fallen further, to achieve economies, and is now barely one quarter of the establishment.

There was no conscious decision that the implicit standard for traffic warden services on which the establishment was based was too high, or that it could be met more efficiently by use of police officers. The police authority had no information on levels of parking compliance, or on the proportion of fixed penalties issued by police officers.

In another force bids from local sub-units saw traffic warden strength rise from 86 posts in 1965 to 177 in 1971. In 1975 a formula was adopted which at first indicated a need for 303 posts and was amended to settle on a figure of 260. The authorised establishment remained at 177. In 1977 strength was reduced to 98 posts in line with Home Office requirements for economy under a public expenditure restraint programme. Currently it stands at a lower number, described in an internal review as cash-limited, whereby the number of traffic wardens is determined not according to any establishment figure but through the finance available from a fixed budget allocation. The Home Office now encourages civilianisation in the police service. But old attitudes die hard, as arbitrary financial limits on traffic warden strength at local level illustrate.

The contributions of chief constables to budget-making do not always help to improve traffic warden services. Within the police service there is almost always a preference for employment of police officers over civilians. This is sometimes expressed as a view that extra traffic wardens, though useful, should not be at the expense of numbers of police officers. This is no basis for sensible resource allocation: any traffic wardens can always be seen as being at the expense of police officer strength. If all the wardens in England and Wales were removed, the money could pay for an extra 1,500 police constables. But this would be pointless if they were then employed on duties which wardens could do.

A number of forces studied by the Commission recorded a notional establishment higher than budgets would allow (Exhibit 13). These notional figures are explained as markers for future bids, indicating the number of wardens to be employed when the authority can afford them. What these figures actually represent is an intention to give a higher priority to employing traffic wardens at some unspecified point in the future. This is worthless.

MANAGEMENT

Delegation requires clear operational objectives and clear service standards which managers are to achieve, and a clear understanding of how achievement will be assessed. None of these elements occurs in the delegation of responsibility for parking enforcement within police forces. Local managers are generally not kept on their toes by scrutiny of traffic warden work by their supervisors or by internal inspection. Force inspectors give perfunctory attention to traffic wardens, usually confining...
themselves to checking on levels of complaint from the public about ticketing. Some forces have no formal systems for annual appraisal of their civilian personnel; in those that do, it is rare for anything in them to be tailored to the operational characteristics of a warden's job or to concern quantified assessments.

41 Supervision of wardens is sometimes undertaken by police officers, either a sub-divisional chief inspector or a duty sergeant, and sometimes by senior wardens. The Metropolitan Police developed five ranks before deciding recently to consolidate the structure. Many forces have just two the basic grade and senior wardens. Rank structures are not related to force size. Of two forces with over 100 wardens, one has four ranks and the other has no rank structure. Amongst forces studied with a traffic warden rank structure, the ratio of numbers in higher ranks to those in the basic grade varies from 1:15 to as high as 1:5.

42 Allocation of wardens to beats is often 'historical', taking no account of changes in parking regulations, pedestrianisation, traffic flows etc. Supervision on the street is often minimal or absent. Some wardens interviewed: thought that supervision was confined to trainees, and did not expect to meet a supervisor - either a senior warden or a police officer - on their beat at all. Training usually involves a period of job-shadowing in which trainees are paired with an experienced warden. In some forces this may last for two weeks. In one force it was usually eight weeks.

43 A high proportion of wardens' time is spent unproductively, walking to and from beats. The Metropolitan Police found that as much as 45% of their time could be lost that way. In provincial forces there are instances where the proportion is higher. Some forces require their wardens to return to police stations for a lunch break, and do not provide transport. Parading in the morning to be allocated a beat, walking out to it, taking a tea break, walking back for a lunch break, walking out again, taking an afternoon break, and walking back to do paperwork, can account for as much as half the working day.

44 And a high proportion of days is lost through sickness (Exhibit 14). In police officers in the same forces - three and a half times higher in one case. One force was losing a fifth of its traffic warden strength through sickness. Turnover levels of traffic wardens in a sample of forces studied by the Commission varied between 6% and 28% a year, although forces report no great problems in recruiting new wardens.

45 Working hours are rostered inflexibly. In one town centre where waiting restrictions apply until 6.30 p.m., all the wardens leave the streets at 4.30 p.m. just as the evening rush hour is beginning. The flexibility in rostering hours of work which some contracts of employment allow is often not used; but sometimes the contracts themselves are inflexible. Some forces have written contracts which stop them from bussing wardens to neighbouring towns to work if the need arises. None of the study forces used part-time wardens, and use of seasonal casual employment was very limited.
These problems in the management of parking enforcement arise from policies inside local government, as well as from police management methods. The single underlying cause is that parking enforcement gets a low priority.

A LOW PRIORITY

Police attention to meeting community expectations does not generate a consistent priority for vigorous action by traffic wardens. An exemplary blitz on illegal parking in an area in response to complaints about congestion draws complaints from motorists who feel picked on, and traders who see their businesses threatened if they have come to depend on illegal 'fly-parking'. Criminals are never grateful for law enforcement, but in this case the police face the problem that the offenders are not seen as criminals. Persistent, flagrant breaches of yellow lines do not even have a bearing on qualification to hold a driving licence. Many drivers perpetrate them casually, and regard the penalties as an occupational hazard. There seem to be no victims to protect, there are no significant moral dimensions, little thanks to be had from the rest of society, and potentially a lot of resentment from the offenders.

Within highways authorities, enforcement of yellow lines is regarded as a police function, and insufficient attention is given to monitoring compliance levels or the effect which compliance is achieving - that is, are the regulations useful? And for police authorities, employment of traffic wardens is low on the list of how budgets should be spent.

This is not unique to this country. Consultations with police forces in Germany, the Netherlands and Spain suggest similar problems there, with a reluctance to accord a high priority to the service amongst other demands, and a lack of clear objectives. Given the widespread view amongst the agencies involved that parking enforcement is not very important, it is reasonable to ask why it should attract more management effort than it does. There are several reasons:

- first, if it is worth the police service spending £50 million a year on traffic wardens it is worth managing them well. If the subject is not worth this expenditure then it is worth reviewing it to identify the scope for savings;
- second, it is only if the subject receives consistently greater attention that there will be an impetus within forces to make better use of existing resources;
- third, the procedures of setting standards, allocating resources and measuring performance should be integral to police management across the board - there is no reason to exempt any police services (including parking enforcement) from them; and
- fourth, highways authorities need to form a view of compliance, whether subjectively or by organising surveys, as part of their own policy review.

THE NEW ACT

The Road Traffic Act 1991, with its powers for the government to transfer responsibility for parking enforcement to highways authorities, will focus attention on these issues. But it also introduces an element of uncertainty into the future of parking enforcement. This section briefly explains its implications. So far most of the consequences can be seen in London.

Traffic wardens first appeared in September 1960, patrolling parking meters in Westminster. Westminster and Croydon, in common with a number of other councils, have for some time employed their own parking attendants to replace the police in this function. Whilst Westminster contracted the job out, Croydon and Camden recruited their own staff in-house. Kensington and Chelsea decided to continue using the police until better powers for council parking attendants were available.

New powers were presaged in the Road Traffic Bill in 1990, which, following pressure from the London boroughs, was to allow council attendants to issue Penalty Charge Notices, akin to FPNs, in controlled spaces in London. These would replace fixed penalty and excess charge notices and notices of intention to prosecute. The boroughs would be able to keep the penalty income so that not only would they continue to get what previously would have been excess charge revenue, but also the revenue from FPNs on controlled spaces which had formerly gone to the government.

These changes were along lines recommended by the Metropolitan Police. The police did not, however, expect an amendment to the Bill, which was passed, allowing decriminalisation of yellow line offences and the extension of the council attendant responsibilities to enforce those restrictions. Boroughs will be able to
apply to set up Special Parking Areas (SPAs), and it has been agreed that these can cover the roadways not designated as 'red routes' or other main arteries. In the SPAs yellow line offences will become civil liabilities subject to Penalty Charge Notices. Boroughs will thus be able to combine enforcement of controlled parking with enforcement of restricted parking by their own parking attendants, and keep the penalty income from both sources. Westminster Council is pressing to have SPAs effective in its area by the end of 1992, and other authorities are hoping to introduce schemes in 1993.

54 The Metropolitan Police support these moves. They will be retaining responsibility for parking enforcement on the newly designated 'red routes' and other main arteries which will not be included in SPAs. SPAs will be interstices in the main traffic network, and withdrawing from parking enforcement within them will allow the police to concentrate on the major highways, within the overall responsibility which they will retain for traffic regulation in the capital. They will continue to employ traffic wardens – and their numbers may even increase as part of measures to improve traffic management.

55 When introducing the Road Traffic Bill, the government argued that the problems of parking enforcement in London were virtually unique. Certainly the available evidence suggests that the scale of non-compliance exceeds that elsewhere. Some years ago the Metropolitan Police concluded that disregard of parking restrictions had become endemic, and the GLC perceived that as few as 1 in 150 illegal parking acts were being penalised, at a time when over 2 million penalties a year were being issued. Other estimates are more conservative, but all point to London facing severe problems. There is also the separation of functions, with London boroughs acting as highways authorities promulgating regulations and central government acting as the authority in the Metropolitan Police District for enforcing them.

...as few as 1 in 150 illegal parking acts were being penalised....'

56 Contributing to a conference in March 1991, the Department of Transport observed that 'London's problems are different, both in scale and by virtue of the institutional arrangements. In the provinces there is perceived to be more scope to match police effort to highways authority objectives'. The Commission's study suggests that this scope has not been exploited. It would be surprising if provincial cities and towns were not facing acute and growing problems with congestion. Indeed some estimates suggest that in some provincial towns as few as one per cent of parking violations may be penalised, putting the problem on the same scale proportionately as in London.

57 A significant amendment was made to the Road Traffic Bill to allow the government to extend the new regime to areas outside London*. This has focused the attention of

provided police forces on traffic wardens, as it raises the prospect of their losing the main rationale for employing them. This is seen not only as a threat to the integrity of police traffic law enforcement, but as an upset to ambitions to make better use of wardens in other ways.

A CHANGING ROLE FOR TRAFFIC WARDENS?

58 A number of forces are proposing to develop traffic wardens as an integral part of street policing. They provide a visible uniformed presence on the streets which may otherwise be hard to muster. When equipped with radios they can report street incidents requiring police attention. They can look out for stolen cars or suspicious behaviour.

59 To some extent this work could be carried out as part of parking patrols, but the ways in which some police forces are now proposing to use wardens do not represent efforts to get the best value from them in parking enforcement, but to use them for higher priority police tasks.

60 These other uses can only be regarded as marginal to wardens' primary duties; they do not represent a move towards more effective parking enforcement. On the contrary, these proposed developments are another manifestation of a low priority for parking enforcement, the inevitable conclusion to which will be that the function ends up as a low priority even for traffic wardens. The same problem would attend arrangements to integrate the duties of local authority parking attendants with other on-street council functions. Where there are sufficient parking problems to jus-

* See Schedule 3 of the Road Traffic Act 1991. The Position is slightly different in Wales to that in England.
tify patrol by specialist staff, the function is best managed as a discrete one.

61 There are, in any case, considerable constraints on the functions which can be assigned to traffic wardens, since these are governed by the Functions of Traffic Wardens Order 1970 and a 1986 Amendment Order. The legislation specifically prohibits traffic wardens from being employed for functions other than those prescribed.

62 The case for traffic wardens to be employed to do prescribed duties in addition to parking enforcement remains, however. They can direct traffic when automatic signals fail and they can carry out school crossing patrols. The Road Traffic Act 1991 also allows them to be given other duties formerly reserved to police officers, such as issuing fixed penalty notices for certain endorsable offences, and authorizing vehicle tow-aways.

63, Provincial forces are concerned that a transfer of functions to highways authorities outside London could have adverse effects. If the subject were approached clumsily, they might end up deprived of traffic wardens and having to devote police constables, uneconomically, to these other duties at a time when the police are already under many other pressures. Many forces would favour the solution of their police authority being able to retain fixed penalty income to finance the cost of enforcement. (If a traffic warden issues 1,200 tickets a year, then the cost per ticket issued is around £10). However the Act does not allow this. By instead allowing the income to be retained by highways authorities if they take over parking enforcement, it introduces a further complicating factor.

64 The ability of highways authorities to keep the income from the new Penalty Charge Notices represents an opportunity for them to secure revenues which currently accrue to central government, without incurring any extra costs, as shown by the illustrative example in Box C. The precise financial balance would need to be calculated carefully in each case, looking at actual levels of ticket issues, payment rates, processing and attendants’ costs. An authority would also need to take account of how ticket issues might be boosted by productivity gains from better management, and from employment of extra attendants.

Box C

THE FINANCIAL CONSEQUENCES OF A TRANSFER OF FUNCTIONS

Local government as a whole may benefit financially from taking over parking enforcement even where penalty income does not cover enforcement costs, as this illustrative example shows.

Assume that reinforcement officers cost £12,000 a year each to employ, including on-costs and supervision, and that tickets cost £1.50 to process. Other costs are disregarded for simplicity. Seventy five per cent of penalties are paid at £16 each. Home Office grant covers 51 per cent of police authority costs. Other grants are unaffected.

In case A, ten officers write 1200 tickets a year each, in case B they write only 800 tickets a year each. In scenario (i) the enforcement is carried out by the police authority and in (ii) by the highways authority.

<table>
<thead>
<tr>
<th></th>
<th>CASE A</th>
<th>CASE B</th>
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<tbody>
<tr>
<td></td>
<td>Scenario (i)</td>
<td>Scenario (ii)</td>
</tr>
<tr>
<td></td>
<td>£000 per annum</td>
<td>£000 per annum</td>
</tr>
<tr>
<td>Police authority</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Costs</td>
<td>138</td>
<td>132</td>
</tr>
<tr>
<td>Income from Home Office</td>
<td>70</td>
<td>67</td>
</tr>
<tr>
<td>Surplus/(deficit)</td>
<td>(68)</td>
<td>(65)</td>
</tr>
<tr>
<td>Highways authority</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Costs</td>
<td>138</td>
<td>132</td>
</tr>
<tr>
<td>Income from tickets</td>
<td>144</td>
<td>96</td>
</tr>
<tr>
<td>Surplus/(deficit)</td>
<td>6</td>
<td>(65)</td>
</tr>
<tr>
<td>Local government overall</td>
<td>138</td>
<td>132</td>
</tr>
<tr>
<td>Costs</td>
<td>70</td>
<td>144</td>
</tr>
<tr>
<td>Surplus/(deficit)</td>
<td>(68)</td>
<td>(65)</td>
</tr>
<tr>
<td>Change if highways authority takes over enforcement from police authority</td>
<td>+74</td>
<td>+29</td>
</tr>
</tbody>
</table>
Revenue could be much higher than currently produced by police authorities, which have no financial incentive to undertake parking enforcement and to whom it represents a net cost. The government’s recent proposal to extend competitive tendering to the services of parking attendants, employed by local authorities under the Road Traffic Act 1991, will have a bearing on this.

65 There are two drawbacks to an approach concentrating on enforcement as a purely financial exercise:

- firstly, it could lead to over-regulation of parking, not only with regulations being enforced overzealously, but also with unnecessary regulations being made to broaden what would have become in effect a tax-base for local government. This might distort transport policies. And, viewed as a tax, parking penalties are inefficient to collect: the costs are high. There are, however, constraints on applying any revenue surplus from the parking account, and the Secretary of State has the power to approve the level of penalty charges and associated fees;

- secondly, use might be made of local authority attendants in circumstances where it would be more efficient to use police officers, simply as a way of getting the penalty income which would otherwise flow to central government. The optimal balance of costs and income to the public sector as a whole could differ from the narrower financial interests of local government. There are also the adverse effects on policing, although most of these will represent foregone opportunities rather than an adverse impact on existing practices.

66 The balance of interests will vary from one locality to another, even within forces, but broadly speaking there will be a difference between rural and densely urbanised areas. In major town centres with serious congestion demanding dedicated parking enforcement, use of traffic wardens concentrating on that function will be justified and there will be more scope for implementing the new regime in a way which will satisfy the financial interests of highways authorities and lead to better traffic management. In other areas the financial case for the transfer may be harder to make, and the scope for the police to use wardens in other ways without undermining parking objectives may be greater. The aim of parking regulations is not to raise income, and it does not follow that they should be made and enforced only to the extent that penalty income will cover their costs. But local authorities should certainly be conscious of the financial dimension to a transfer of functions.

‘...The balance of interests will vary from one locality to another...’

67 Balancing this against the other factors will be an intricate process, in which the pros and cons will involve highly localised considerations. There is also the broader consideration that a ‘patchwork quilt’ might develop, with some parts of towns covered by the police, and some by local authority attendants. In itself this could have an adverse effect on traffic management, pointing to one agency or the other being assigned responsibility over wider areas.

OVERSEAS EXPERIENCE

68 Comparisons with continental European countries are difficult; their structures of local government and policing are different. But some police forces abroad have adopted different approaches to parking enforcement, which are worthy of consideration.

69 For instance, until 1984, parking enforcement in the Netherlands was usually the responsibility of the police. In Amsterdam they employed civilians to carry it out, but the service was seen as poorly managed and ineffective, attracting a low priority and associated with a low status for those involved. In 1984 the Netherlands government required all local authorities to reconsider parking policies, and the upshot in Amsterdam was a partial transfer of functions to a new local authority Parking Control Department.

70 The Department assumed responsibility for parking enforcement in the inner city area between 7.30 a.m. and 11.00 p.m., leaving the police to cover nights (and all hours of the day in the suburbs). It was allowed to retain penalty income, which technically is seen as local taxation. It has since extended its activity under contract with outer boroughs to cover arterial routes in their areas, and sees advantage in extending further to cover the whole city.

71 Technically, law enforcement remains a police responsibility which the Department carries out under licence
from the local police chief. The police see advantages in taking the Department over, to integrate its services with theirs. The Department, which has been self-financing from penalty income since 1987, prefers independence and fears a return to being a low priority if absorbed into the police force. Currently, its staff have no other duties, although they could be licensed to undertake other aspects of traffic control.

72 Within the same statutory framework, a different approach is followed in Utrecht, where the parking wardens work under the control of the police chief, although they are employed by the municipality. They exercise wider powers in relation to traffic control, and are more integrated with the police force — working from police stations, contributing to a crime intelligence system and using radios to report emergencies. Those involved claim that this approach works more satisfactorily than would discrete specialism.

73 In Germany and Spain as well as in the Netherlands, parking control is moving up political agendas, but enforcement practices vary widely. In all three countries there are tensions between the ambitions of local government to provide parking facilities for businesses and residents and see them regulated effectively, and the ambitions of police agencies to retain an integrated responsibility for law and order including traffic offences. This can result in a low priority to managing parking as an amenity. These tensions mirror those found by the Commission's study in this country.

74 The lesson which emerges is that whoever is responsible for parking enforcement, the service needs to be well managed in concert with traffic policies. This need not always point to the local highways authority being responsible for enforcement, but it does always point to enforcement being based on clear traffic management objectives. Although the following recommendations are directed primarily to the cases where the police retain responsibility, which will be in the majority for some time to come, the principles will also apply where functions are transferred.

‘...whoever is responsible for parking enforcement, the service needs to be well managed in concert with traffic policies...’

75 Improving management should start with setting clear objectives. Highways authorities should discuss with the police the levels of compliance which they require. In single shire forces, it should be possible to integrate the making of parking regulations with their enforcement. The county council should state desired levels of compliance and consider the resource requirements of enforcement and their implications for the police budget when considering making a restriction. This need not be a recipe for unnecessary bureaucracy:

- the compliance aims should be broadly similar for a class of restriction and a type of road across an area; and

- activity of each small change in regulations can best be reflected by looking periodically at the aggregate position rather than arguing about details at any point in time. Problems emerging over time in enforcing a level of compliance would signal the need either for the highways department to slow down the promulgation of parking regulations, or for the police to put more resources into enforcing them or for a change in style of enforcement.

76 Whilst clear compliance objectives should be the basis of enforcement work, they will need to be kept closely under review and in the current state of knowledge they will not be suitable as operational performance measures — especially not where contracts with commercial operators are involved. Pooling of experiences in measuring the impact of enforcement will be essential to developing a better basis for policy in this area.

77 A further complication is that there will be at least two features of compliance which are relevant to traffic aims: first, the incidence of illegal acts, and second, their duration. There may be an impact from more intensive enforcement in making illegal parking acts much briefer, which will not necessarily be reflected in statistics of the proportion of acts which are illegal. Plainly, illegal parking of this sort is harder to police than acts of longer duration.

78 This leads into enforcement style. Clarifying the policy and taking steps to ensure that it is followed through...
into practice - through training, supervision and internal inspection — is not just a matter of quality assurance for the police. It needs to take account of the attitudes of magistrates to cases which get to court, which means consulting the police authority, on which local magistrates sit. It must also involve the highways authority, since the way that restrictions are framed, and the balance between controlled and restricted parking, will have implications for how areas have to be patrolled; and the average duration of illegal parking acts will affect the ability of the police to meet compliance aims with given enforcement resources.

79 It also affects resource allocations, in which both the police authority and the highways authority have an interest. The more resource-intensive the style of enforcement, the fewer the regulations which the force can cope with, or the lower the standards of enforcement which can be achieved, or the more resources it will need to allocate to parking. Whatever the outcome of these discussions, the aim of enforcement is to encourage compliance with the regulations, and compliance objectives must be central to the exercise (Exhibit 15).

80 Westminster Council has divided its area into geographical sectors, for each of which it monitors compliance with parking regulations by street surveys. Aims for compliance are set for each sector, with the intention of improving compliance in general. Targets for penalty issues are set accordingly for the external contractor: in sectors with relatively low compliance the targets are relatively higher. The impact of ticketing on compliance is assessed through regular compliance surveys, and the ticket targets are adjusted accordingly.

81 This can be an expensive exercise, because just as the factors determining the workload involved in achieving a given impact on compliance may exhibit highly localised variations, so, too, may the workload implied by a ticket issue target be very variable from place to place and from time to time. A balance must be drawn between the costs of management and the benefits which it produces. Most commentators agree that nationally the balance is wrong and that considerably more, and better informed, management is needed if the growing problems of parking abuse are to be tackled cost-effectively. But in most areas without the acute problems faced by Westminster a simple approach may be better, using operational performance measures (coverage, time on patrol, ticket issues per shift etc.) which are a proxy for compliance, backed up by occasional reviews of the impact on the ground.

RESOURCES

82 Parking enforcement is not just about traffic wardens, and traffic wardens are not just about parking enforcement. One determinant of the correct number of wardens to employ is the required amount of parking en-
enforcement activity and the extent to which it is economical to substitute wardens for police officers in carrying it out. In villages with few restrictions, with low priorities for enforcing compliance, it can be difficult to justify a warden, and in suburban areas the case for them might be balanced. Reliance on police officers for enforcement in these cases opens the risk of its being squeezed out by pressure for police services which wardens cannot deliver. It is essential therefore to set quantified aims for enforcement - if not directly in terms of compliance, then in terms of a proxy for the police contribution to it.

83 Those aims should drive resource decisions, as described by Exhibit 16. An assessment of actual compliance, against the objective, will indicate the need for enforcement. Local knowledge will be an important factor in translating this into workload. Bids from local commanders should be sought as the basis for resource decisions, and discussed with them and the highways authority to identify the service standards implied. In many places it will be a matter of subjective assessment of parking problems and solutions.

84 This is no more than forces attempted when wardens were first being introduced. The critical point, however, is that if the resulting number of wardens is not acceptable on financial grounds, the reasons must be set out clearly and analysed. If a lower establishment is set, it must be rationalised explicitly in terms of lower enforcement standards or greater use of police officers. In due course a formula should be developed to guide policy on the number of wardens and their allocation to local commands.

85 Each local commander must know the standards of compliance expected. Initially it could be unfair to hold them to account for achieving those standards, for reasons discussed above. It could be appropriate in those cases to set standards for local commanders in terms of penalty issues, or frequency of visits by wardens to parts of their beats, subject to keeping under review the impact they have on compliance.

86 Approaching the subject in this way does not necessarily mean that more resources will be put into parking enforcement, or that it will get a higher priority amongst police services. The outcome may be decisions that existing resources and compliance levels are adequate. It does ensure that policy decisions are being taken...
explicitly rather than by default, and that a basis exists for firm and efficient management of the function.

PERFORMANCE MEASUREMENT

87 The key to the process is performance measurement. There must be several layers (Exhibit 17). There could be benchmarks indicating the expected range of penalty issues per beat or per warden (based on analyses such as that in Exhibit 12). These could be set by managers in the light of practical experience of what level of ticketing will achieve the desired compliance level. They would not be targets but would be used by management for monitoring purposes, and managers might wish to investigate exceptionally low or high achievement. They must not be seen as threatening automatic administrative or disciplinary action if they are not met, but it should be clear to the personnel involved that the number of tickets issued will be one of a number of factors in personal appraisals.

88 A range of other indicators should be considered. The ways in which wardens cover their beats will be important. In some cases they may be directed to visit each part of it a certain number of times, or some parts more frequently than others. The most local knowledge of all, that of the wardens themselves, should be used in making these judgements. Error rates in tickets should be monitored, as should styles of enforcement, which should be managed proactively rather than merely in reaction to complaints. Internal inspection by the force should look not only at these indicators, but also at whether best use is being made of wardens in substitution for police officers.

89 And of course there must be a view on achievement in terms of parking compliance. It will be best for the highways authority to undertake the surveys involved. In many rural areas it will not be necessary to do them annually - subjective assessments by local commanders and highways personnel may suffice, with surveys done only where there is disagreement or an apparent problem. In densely congested urban areas more than one survey a year may be regularly proprogrammed.

90 The effect of the regulations will itself need to be kept under review. Is compliance achieving the aims of the regulations? The Department of Transport advised a conference on parking management earlier this year that "once a decision [on a traffic regulation scheme] is made, authorities need to assess how far it has met the original objectives. Monitoring a scheme once it is in place is therefore an important activity. Of course it has resource implications but that should be taken into account from the start. Without a reasonable method of follow up, authorities are less well placed to determine the strengths and weaknesses of a scheme and to make adjustments."
MANAGEMENT

91 The most important actions are needed in management. Forces should consider their policy on supervision of wardens, for example supervisory sergeants and senior wardens. Beats for parking enforcement need to be organised so as best to meet the service standards. It is likely that programmed activity by police officers will reflect the economics of having them issue occasional tickets on existing general beat patrols, where this will achieve the compliance aim. Where frequent dedicated patrol is necessary for parking enforcement this will point to deployment of a warden. Wardens' beats need to be kept under review, and not allowed to ossify in historical patterns. Wardens should be rotated amongst them. Warden rostering should be more flexible in responding to peaks and troughs in offence rates. Use of part-time and seasonal wardens would help to concentrate resources at the busiest times.

92 Managers should be familiar with work on the beats and how it changes, and able to take their own view on how well wardens are performing and how they could be helped to do better. (Wardens themselves should be encouraged to express their own views on these matters.) This should involve management by walking around. Observation will lead to commonsense ideas about transporting wardens to and from their beats. The costs of giving them lifts, or providing them with their own transport, must represent good value in a number of the cases found by the Commission where time is spent unproductively walking to and from the starts of beats. Devolved budgeting should give local commanders an incentive to rationalise these costs, consistent with achieving a given standard of parking enforcement.

93 This approach, of delegated responsibility to local managers to ensure a service standard, is to be preferred to the alternative of drawing management of parking enforcement into the centre to ensure that it is not squeezed out by other local concerns. If the lowest priority service is always centralised, the end-result is that almost everything becomes managed by headquarters. This may seem easier in the short term, as it offers a way for headquarters to avoid the difficult issues of setting standards and defining performance measures, but in the longer term it offers no solution to these problems. It can also cause inefficient use of resources, lack of responsiveness to local circumstances, and a devaluation of local commanders' responsibility.

94 Occasional activity surveys should be conducted. For instance, the technique used in Dyfed-Powys Police for surveying police officer activity could be applied. The force has bought about 40 small hand-held computers, which can be carried in a belt holster. Surveys are carried out on a rolling programme basis with each sub-division allocated a two week period where incidents and activities are recorded. Every operational officer (up to and including the rank of superintendent) is issued with a hand-held computer at the commencement of each shift and the computer is returned at its conclusion. Every 15 minutes the computer beeps to remind the officer an input is required and he/she is presented with a simple menu to enter codes recording current activity. The storage capacity is such that downloading need only be carried out at the end of the survey period. The information is downloaded into a desktop computer, analysed and presented graphically to the sub-division concerned. Occasional surveys of traffic wardens could be undertaken in this way to understand how their time is spent. The Home Office is giving the technique a trial as part of its joint study with the Treasury of police manpower, as an alternative to clumsy methods requiring officers to carry a large card on which they tick boxes in pencil. Error rates using that method can exceed 90 per cent.

INTEGRATION AND MORALE

95 Traffic wardens need management attention to get the best out of them, and morale problems need to be addressed. Some police managers see the source of many problems with the traffic warden service as the low esteem in which wardens are held, both by police officers and the general public. (Amongst the public, one opinion survey put only double glazing salesmen lower than wardens in public esteem). Local authorities are at pains to refer to their 'parking attendants' to avoid the negative connotations of the term 'warden'. The low status of traffic wardens inside the police service is partly a reflection of the barriers in the service between 'real' police officers-who can exercise the powers of constables and who carry warrant cards to prove it - and 'civilian support'. This barrier needs to be broken down.

96 Performance appraisal of police service civilians is poorly developed, and they are often subject to petty re-
restrictions - for instance, in some forces there is a policy of denying compassionate leave to traffic wardens. This sort of policy may be partly responsible for high levels of reported sickness. One force concluded that 'inflexible attitudes to the grant of annual leave at short notice, and over-strict adherence to quotas for approving annual leave may contribute to the high sickness rate'.

97 In any case, the reasons for high levels of sickness need to be investigated wherever they occur. The reasons may differ from case to case, but high sickness is invariably an indicator that something is going wrong, and it must not be ignored or allowed to become institutionalised.

CONCLUSION

98 The main weaknesses in parking enforcement under the current regime, and how they should be addressed, are summarised in Exhibit 18. As described throughout this paper, the management of traffic is complex, its results difficult to model, and the local effects of enforcement upon it, uncertain. The problems in relating activity by traffic wardens to the impact on high level aims such as traffic speeds are well rehearsed. But if wardens make any impact at all by walking their beats, it is incumbent upon the force to identify that impact and seek to maximise it cost-effectively.

99 There are no compelling reasons of principle for the police service to retain parking enforcement functions everywhere and there are no universally compelling reasons for local authorities to take them on. The government seems to be approaching the subject in an exploratory way. One factor which it should keep under close attention, where a transfer of functions is authorised, is the quality of traffic policies behind local enforcement programmes. The temptation to use parking enforcement as a source of revenue may be difficult to resist for local authorities whose other sources are constrained, and the result might not always be particularly beneficial to traffic management.

100 Parking enforcement is a low priority for police forces, and always will be. They have many more important resssues to contend with, and parking enforcement can be very labour intensive. Whilst much should be achievable without relatively great management effort on issues such as traffic warden rostering, allocation of beats, provision of transport and so on, one-off spasms of interest in the subject will not lead to profound improvements in the present or prevent the recurrence of problems in the future.

101 Tackling the roots of the underlying problem is not a simple matter. The recommendations made here (Box D) may seem out of proportion to the nature of the problems, but parking enforcement should not be allowed to languish as it has done in the hinterland of activity which is too expensive to ignore but not important enough to receive concerted attention. Police forces and their authorities need to consider whether parking enforcement is a function with which to continue. Where the function is transferred, the same principles of management as recommended here for the police should be followed by highways authorities. In the case of the

![Exhibit 18](image-url)

MAIN WEAKNESSES AND REMEDIES

Overcoming weaknesses in parking enforcement needs action in highways authorities and police authorities as well as in police forces...
### Box D

**SUMMARY OF RECOMMENDATIONS**

<table>
<thead>
<tr>
<th>Main recommendations</th>
<th>Paragraph number</th>
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<tbody>
<tr>
<td>Highways authorities should discuss with the police the levels of compliance which they require, and their resource implications</td>
<td>75</td>
</tr>
<tr>
<td>Forces should settle their policy on enforcement style and ensure that it is followed through into practice</td>
<td>78</td>
</tr>
<tr>
<td>Resources should be decided in the light of compliance aims</td>
<td>82</td>
</tr>
<tr>
<td>Responsibility for achieving service standards should be delegated to local commanders</td>
<td>85, 93</td>
</tr>
<tr>
<td>Performance indicators should be established and monitored, including assessment of compliance</td>
<td>87</td>
</tr>
<tr>
<td>Beats for parking enforcement should be reviewed</td>
<td>91</td>
</tr>
<tr>
<td>Working practices should be improved, and the use of part-time and seasonal wardens considered</td>
<td>91, 92</td>
</tr>
<tr>
<td>Occasional surveys of traffic wardens’ activity should be conducted</td>
<td>94</td>
</tr>
<tr>
<td>Any problems of the morale of traffic wardens need to be addressed</td>
<td>95</td>
</tr>
<tr>
<td>Performance appraisals for traffic wardens should be introduced</td>
<td>96</td>
</tr>
</tbody>
</table>

Police they are aimed at ensuring an adequate priority for parking enforcement; in the case of highways authorities they are aimed at anchoring enforcement in traffic policy, rather than revenue-raising objectives. In both cases the aim is to base day-to-day management on rational consideration of how best to meet clear objectives for the benefit of the public, both those directly involved as road users and those relying indirectly on road transport, who are paying the costs of ineffective enforcement services and the avoidable congestion which results.

**ACKNOWLEDGEMENTS**

The Commission is grateful for the co-operation of a number of individual police forces and local authorities in this country and abroad, and for advice received from the Department of Transport, the Home Office, HM Inspectorate of Constabulary, the Transport and Road Research Laboratory, the local authority associations, the police staff associations, NALGO and other bodies. However, the conclusions reached are as always solely the responsibility of the Commission.