Org/Role	Section (some pg no's different in final policy doc)	Comment
		General
DOI		I have read the consultation and have looked at the staff car parking charges I have no problem in paying £275 for an allocated space spread over a twelve month for my parking permit 154. It's a good way for revenue to be earned in the car parks and staff should have no problem with this as spaces are a valuable commodity.
DHSC	General	I think it's a positive idea, sadly working in Douglas does come at a cost and many people don't have access to free spaces anyway.
DED - Tourism/Motors port	Fees	The fee proposed is not in keeping with commercial rates. Either charge appropriately or not at all. Charging at this heavily discounted rate is a less than halfway house to appease public criticism
DED - Tourism/Motors port	Consultation	Your consultation period is too short
MNH		I have discussed this previously with colleagues elsewhere in government and my view is that this proposal does not apply to MNH as we do not provide allocated or unallocated staff car parking in areas where we charge for the public to park. We do provide free parking for the public at the Manx Museum and I note that some staff do park there on an informal basis subject to availability. I would hope that in doing so staff give due consideration to the benefits of allowing visitors to park there.
		I would remind people that we have an excellent and cheap public transport system on the island – with developments such as on- bus wi-fi and GPS tracked live information apps coming on stream later in the year
Treasury	Fees	However, if they go ahead with the parking charge it should be raised against all government employees, not just those in central Douglas as this is discriminatory and totally unfair.
Treasury	Fees	I 100% agree with the charging, especially as it is usually the higher grade officers who receive the higher remuneration that get the spaces allocated to them. My only comment is that the charges in Chester Street are approximately £1000 a year. So for me the charge of £275.00 a year is far too low. I think it should be nearer to the £1000 I and others who park in central Douglas pay for a parking space. Especially as the spaces allocated to employees are usually in very prime positions, very close to their place of work.

DOI	General	Charging Government employees for prime parking spaces within Douglas – the bigger picture should consider the opportunity for Government to use this useful, valuable land and its associated buildings for lease options to encourage businesses into the Capital and growth will surely follow.
		• By moving Government Offices/officers away from the Capital would financially support other areas i.e. North/South and Western areas of the Island.
DHA	Мар	Further to the consultation that has been put on the Government website I would be grateful, if possible, for a clearer map indicating what is the central douglas disc parking zone please. At present, assuming the red dots are indicating the parking zone, it would seem unclear as to whether Homefield would fall within this zone
	Fees	You will be aware that the provision of a parking space to an employee by an employer is not treated as a benefit in kind and is exempt from income tax. You can therefore argue that it is actually fair and consistent to provide free car parking for public servants. Non employees or the general public coming into Douglas have the option to pay or find a free disc zone space. To charge civil servants when a general tax exemption is in place seems wholly unfair and not defensible. If this comes into force are you considering removing the tax exemption covering this provision on the Island for all employees, both private and public? In addition, is it fair to single out employees based in Douglas? What about the prime parking spaces at the airport enjoyed by Tynwald members and employees for example? In addition, what revenues are you hoping to take in from this? Once again it seems to me that departments are missing the point of cost reduction and that the only effective way to save money is to actually look at reducing staffing. This penny pinching is likely to fall short of being cost effective.
Treasury	Fees	I am a civil servant who has for numerous years paid for a contract parking space in Chester Street Car Park while colleagues I work with either park free of charge in disc zones leaving the office to move the vehicle while I cover for them. Or they are part of a rota system receiving a free parking space when it is their turn. Because I do not come to work at the same time every day and because I see many clients it was not possible for me to make use of the disc zones because I may be with a client when the vehicle requires moving and I did on one occasion get a parking ticket which is very costly. So the reserved space I have is my own choice.
DHSC	Fees	am not happy with the charges; however, I would only agree to this if it included MHKs or MLC's who do not use their cars daily and of course HR staff!

DHSC	Fees	Can you please confirm if the Community Health Centre on Westmoreland Road is included in this proposal? If we are of not, I have to express say I believe this proposal is completely inappropriate and unfair to those it is targeting. It should be a charge across the board or not all. To explain I work in a health care team of approximately 50 staff, as you can imagine the majority of the staff here are health care professionals. This proposal would mean the only staff affected would be me and my team of 6 civil servants. Although I cannot speak for the rest of the staff working on the Westmoreland site, I know the situation would be the same, ie, a very small percentage of the staff population would be charged, whilst the majority would not. This to me seems extremely unfair and I'm sure anyone reading this email would have no option but to agree.
		In the email it states "The policy recommends that there be no charge for essential users, the disabled and others such as volunteers and staff who work unsocial hours. It is also proposed that there be some discounts depending on the frequency of business usage." I myself have to take minutes at offsite areas and attend offsite meetings regularly, and another member in my team works in a training capacity – this requires us to travel for business use would this exclude us of the charge? If so, then only 5 staff out of a team of 50 would be paying for parking.
		I can only speak for myself, but if this proposal does go through I will be travelling in to work with my husband to avoid the charge, and therefore would mean I would be unable to take offsite minutes or attend meetings.
		I don't believe this parking proposal has been well thought through. As mentioned above there is the question of fairness to all
GTS	General	1) Promotions will be even less attractive (on top of the new starter conditions of less potential pay), so the Government will not be so attractive to work for, meaning the Government will have to pay more for contractors.
		2) People will leave Government than look for promotion, taking their skills and history knowledge with them, which will cost the Government to train someone else, which will have a knock on affect to the general public.
		3) If there are less skilled employees in the Government, then it will take longer to "Grow the economy" and "Protect the innocent". This will therefore cost Government more in the long run, which will have a knock on affect to the general public.
		4) More employees will be park on the street, meaning less work will be done by employees moving their cars around the Douglas. This will cost Government more in the long run, which will have a knock on affect to the general public.
		5) If there are more parked on the street, then there will be less spaces for the general public, meaning more will need to park in car parks, meaning it will cost the general public more.
		6) If more cars are travelling around Douglas looking for a space, more petrol will be used, meaning more pollution, so not good for the environment or the general public. This will lead to more ill health, which will cost the Government and the general public.

DED - Ship Registry	Fairness	A little feedback on the consultation, whilst I have no issue with paying for a parking space, what I have a problem with is the fact that this is only being placed on those who have no choice but to work within the proposed zone, we are therefore being unfairly penalised. I feel that this should be applied to all public servants who are provided or have an at work parking space, no matter where their place of work is. We moved from Peregrine House to St Georges House 3 years ago, on the basis of cost 'saving'. No savings have been achieved as Peregrine House is still occupied by DOI, but the difference is that I and my colleagues lucky enough to potentially be allocated a space will have to pay for it, whereas if we were at Peregrine House we would not. Therefore my issue is that of the fairness of the application of the policy.
GITS	Fees	1. I believe the charge should at least equal, preferable be more than the standard charge for the public which is about £900. The parking is of a higher valve to the customer as it much closer to their place of work; also it is generally allocated to managers paid more than the average member of the public. I don't see a risk for government that members wouldn't take the parking as parking on the street and moving would be impossible if too many did that and government own a lot of the public parking anyway.
GTS	Definitions	I think the exception for essential users should be dropped as anyone could claim that, and disabled getting free parking should be looked into carefully and not just put in the policy because that is the norm.
GTS	Consistency across Departments	There should be something in the policy to make sure departments can't decide not to pass the cost on as then what would be the point
	Fairness	 My view on this, although not directly affected, is one of yet another kick in the teeth for government workers, this will massively affect the lower paid who are already hard pushed to make ends meet. It smacks yet again of penny pinching and of relying on the government employee to be plugging the cash flow hole in the Islands finances. This problem is not just government workers problem it's the Island's problem. Government employees seem to be constantly under pressure to bear the brunt of this. Pay cuts, redundancies, pensions, changes to T&C's, its never ending. This measure is neither fair nor equitable and despite the Governments' repeated "employees are our number one asset", very little is done to back this up, especially when under attack in the media. I think I can rely on the "Have your say" survey to emphasize certain points of this. See items 11. / 57. / 58. / 62. / 64. / 71. / 75. The IOM Government should be a place that people aspire to work for; the way it is going we will become an employment of last resort. Surely we want the best for our Island.

DOI	-	I've looked at the consultation document and am unsure as to how to repsond? Do I just email you that that I agree with the principle .
		I have a number of queries in that I currently occupy a space outside Murray House that I vacate each time the planning committee sits to allow for its use by the members. That's one day every two weeks. For those days I have used Chester Street (you have to be in early to get an all day space on the upper floors) or I occupy any vacant spaces that our officers have.
		I use my car intermittently to go to meetings at the likes of public records or the sea terminal. That use would fall into the less than weekly category. I would hope to make application to have the space in that capacity but would that justify agreement? Are all spaces being removed and it's up to the applicant to justify having one and for the Dept to agree? i.e would consideration of my request be at the discretion and policy of the Accounting Officer?
		Is the consultation just to say 'this is what we're bringing in' can we have your feedback?
		Also I would anticipate that some spaces occupied by Division may as a result be given up. Do they go back into the Department pool?
		Finally I do belive that there may be inconsistency across the Departments to applying these rules. I have heard that DHSc have already said that they would be meeting the cost for spaces for their consultants and not charging them back. So I'd be concerned that departments would not show consistency in their practice?
	Fees	Thank you for copying me in on this consultation. I am employed as the Deputy Legal Aid Certifying Officer and do not currently have a car parking space although I am very much aware that many government spaces are vacant on many days of the week and in some instances where husband and wife both work for government they actually have two spaces.
		I currently work part time and only bring my car to the island occasionally but the fee in Chester Street would be over £1,500 per year if I had to use the space on every visit.
		I fully support the introduction of a fee but this should be more for high wage earners (I include myself in this). In the private sector several years ago I was paying \pounds 1,000 per year for an under- cover parking space. This was part of the expense of going to work and if you had a good car it was well worth paying for.
		Many of the secure parking spaces would be regarded as luxury parking and should command a higher fee. Currently the lower paid and part time staff are having to pay in the public car parks and the higher paid (who can afford the fee) are being given the spaces for free. Anyone above a wage of £30,000 should, in my view, be paying the full commercial rate for a space. By contrast, the fee should be less for the use of open temporary spaces a long distance from the workplace.
		Could I suggest that when staff are on holiday the spaces become available to part time staff.

DDPS	Fees	I think this is a really good idea especially if everyone is treated the same but I do have a query with regards to the parking fees.
		Is there any particular reason why disabled drivers will not have to pay for their spaces? Surely a disabled person is not paid any less than a non-disabled person? I do think they should be giving priority when spaces are allocated just not sure why they should be exempt from paying.
	Definitions	I don't work in Douglas so I don't really have any say in this, but just one comment – please could we address the phrase 'the disabled'? This is really not an inclusive way of referring to this group of people – a more correct usage would be 'disabled people' or similar.
	Fees	 To start of I would like to state I completely agree that a parking charge should be made for person/s to be charged for parking. Furthermore, I also agree the amounts indicated (£275 & £220) and how the payments will be made (monthly salaries). I do have some comments to make which I would be grateful if they could be considered: I have heard some departments may absorb the cost and not seek members of staff for the payments? If this was the case I would strongly object to the parking fee, I would see this as being grossly unfair. I believe staff should pay the fee, not the department (i.e. public money). If this was to happen, then the whole ideal is flawed and we are in no better position than now. Working in the planning department, Government should be careful allocating parking spaces not connected to the building they serve. When approval is given for offices etc, generally the parking provided with that development is conditioned to be used by the users of that building and/or forms part of the approved drawings. Government shouldn't assume every space is up for 'grabs'. I would want to know which space (or roughly where) I would be allocated, before I agree to make a payment. I would also have concern any person arguing that they need their own car for their job. I need access to a vehicle to undertake site visits/site meetings; however, I presume the majority of people, like me, have access to pool cars? Therefore, if this is the case, there should be no members of staff (including managers/directors etc) requiring having their own car for work purposes, and therefore not paying the fee.
		5. How often and who decides when the fee may increase in the future?

GTS	Management of spaces	Also, if I pay for an allocated space at £275 per annum (which I think is a very fair price by the way) I don't see that DoI can abrogate responsibility for anything that happens to my car when it's in that car park. Equally, if I'm now paying for a 'guaranteed' space (where before I wasn't), and someone is parked in it when I arrive in the morning – what will DoI 9as the person taking the money for the parking space) do about it (and how quickly)? If I'm paying for a space I'm not getting when I want it – what's my re- dress? What course of action can/will be taken against people parking in spaces not allocated to them? Is clamping (and paying for release) an option and would part of that release fee be used to reimburse me for the parking I would have had to pay for because I've had to pay to park somewhere else? I'm not against parking fees per se (although of course I'd prefer they were free •), but I'd expect my space to be available when I needed it if I'd paid and I'd expect a set of actions should someone be in my space that shouldn't be and I'd also expect that payment should include an element of insurance should anything happen to my car parked in the car park.
	Parking part of remuneration package	I would be grateful if you could help me clarify a few points in respect of the changes to the car parking. When I applied for a job within Government, I was offered car parking as a part of the remuneration package. Can you advise on what basis that these terms and conditions are able to change. In addition, in order that I can make appropriate plans for the future, can you advise what other plans are in place to "adjust" our other terms and conditions such as flexitime, maternity/paternity leave, pensions and pay? The consultation states that a charge is made to the relevant Department, Office or Board ("departments") and this cost "must" be recouped by the department: Is the department required to recoup the charge or may it absorb the costs into its own budget by making savings elsewhere? Can staff choose to surrender their parking space or will they be required to pay the unallocated fee on the basis that they would still be entitled to use a free space in the car park. In the same vein, will those who have permission to use an empty (non-guaranteed) space be charged, or will this be on a pro rata basis? In the event a member of staff needs a car for work purposes, can this be claimed as an expense? Can you advise whether the charges will be fixed for a period of time or will these increase year on year above wages such as the case with the sewerage charge?

	Fairness	Finally, I would like to make a brief comment regarding the emotive language used in your covering email stating that:
		"It also recognises that provision of free car parking for public servants in areas where the public may be charged, is neither fair nor defensible"
		As noted above, government employees who receive car parking do so as a part of the remuneration package, a benefit which is very common among professionals in the private sector. If this was indeed to correct a perceived inequity between public and private sector workers, the provision of car parking would be made a taxable benefit in kind and would be rolled out across the board rather than to only a select few. Furthermore the consultation document itself states that this measure is proposed as a revenue raiser for DoI rather than to correct a perceived inequity.
DEC	Fairness	We are located at Hamilton House, which is not shown on the disc zone map, but on-street parking in our close vicinity is a disc zone (Belmont Hill, Thornton Avenue). At the moment there are 26 carparking spaces at our building 22 of which are allocated to high grade workers. We also have a parking compound at Hillsmeadow which offers 10-12 spaces and there are over 60 people who work from Hamilton House on a regular basis.
		Although I appreciate that free carparking is a priviledge and not a right it would seem that the proposed new charges are not fair as those on lower pay grades or who work part-time are subsidising those on higher pay grades. How is it fair that a CEO or Minister pays the same for parking as a part-time AA? Equally, for those of us who have to use our cars for our job, as stated in our contract, we do not have a choice other than to drive to work unless work's cars are made available for our use during the day.
DHSC - Community	Part-time staff	I work in Ramsey 3-4 times a week and CHC 1-2 times a week. Sometimes I am not in Douglas for the entire week. My work days depends on capacity at each area and this is only known from week to week. I will not need a parking space 5 days a week in Central. I am unable to calculate my days spent in Douglas until the end of the year. How will this work for me?? Do I need to pay full price for parking?? If so I do not want a parking space. I may ask to reduce my hours such that I work in Ramsey only.
FSC	Part-time staff	I think the proposals are fair except that where someone works fewer than 5 days a week (my contract is for/ I work 4 days a week), the charge should be pro-rated.
		My (allocated) space is made available to colleagues on the day each week that I do not work – the FSC has a mechanism for advising all staff on a weekly basis which spaces will be available in the following week. It is not available to me on the day that I do not work. Therefore I consider that I should only pay 4/5 of the allocated-space charge.

DEC		• There are 60+ members of staff based at Hamilton House, not including staff and people visiting – there are 26 allocated spaces, 2 visitors spaces and 2 disabled spaces.
		• With regards to Disc Zone, there is one on Belmont Hill – this only holds 5 cars, with a total stay of up to 4 hours.
		• There is another Disc Zone on Belmont Road – this again only holds 4/5 cars and with a total stay of up to 2 hours – not good when
		your in work!
		• The compound where we can park – if your in before 9am – holds up to 10 cars, if you arrive after 9am, there is a big chance of you even getting a space.
		As you can understand from these numbers, there are not enough spaces for staff to park as it is - there have been issues with this
		since we moved from St George's – its never been properly addressed and now we are told if you do get a space you will have to pay
		a lot for it – I wouldn't like to have to pay £220 a year and if I come in late one morning to find that I cannot find a space – where is the fairness of Government taking my money and I still can't park?
		Whilst I appreciate the allocated staff spaces outside of Hamilton house is for management, with respect, they are on much higher
		salaries, than for instance people like me who work part-time, term-time and are on a much lower income and who would struggle to
		find £220 per annum. This issue of charging for government workers is totally unfair – it should be the people who have their own
		personal space right outside the building who should pay – it is their privilege after all that they can park right outside their
		workplace.
Individual		1. I think it is unreasonable that the person who has paid for the space for a year has their space reallocated by the Accounting
	•	Officer to someone else on the days they are off – potentially, I would imagine for up to two weeks annual leave. It does not seem
		fair that someone who has not paid for a space gets to use a space free of charge on occasions. I also believe it would be an
		administrative burden for the Accounting Officer to be dealing with reallocation of spaces on a daily basis. To me, a more reasonable solution would be to allow the person who has purchased the space to reallocate it if they wish to. The person using the space could
		make a gift to the primary owner of the space if they wished to do so.
Individual	-	2. The policy does not explain how the spaces will be split between the relevant Departments – will the number of spaces allocated to
		a Dept be proportionate to the number of employees working for that Dept within the disc zone? Will that change if
		Divisions/Sections of Depts move?
		3. The policy does not explain if Depts have to allocate spaces to themselves to park pooled vehicles and whether the Dept will then incur a charge for such parking.
		incur a charge for such parking.
Individual		5. I think the fee per annum is too low. To me the purpose of the policy is to raise revenue and also to demonstrate that
		Government Officers are not getting parking free and to the expense of the tax payer. The fees proposed are nowhere near what the
		average person pays to park in Douglas for a year and I think this will lead to criticism. I believe the fees should have been
		determined with reference to the average amount paid per year and should be as a minimum £500 per annum.
		The fee level as set would not, to my mind, encourage people to leave their car at home and travel by greener means ie bus, bicycle, foot.

Treasury	Fairness	Operational Requirements If the individual's job description requires them to use their own car for work purposes, as job descriptions are reviewed annually, details of use are irrelevant, and the individual should not need to complete those sections of the form, instead agreeing to the above, and signing the disclaimer should be adequate. It then becomes the manager's responsibility to ensure job descriptions are up to date, and reflect the actual needs of the role. I don't think it's fair as an individual may or may not be shortlisted for a role depending on whether or not they have access and use of their own car for work purposes. They may be required by their manager to attend work in their car, but may only end up using it occasionally. Under the proposed policy, they could be charged the full fee if their actual use is less than weekly.
Treasury	General	General What is the definition of "other space" as listed on the consultation webpage as costing £55 per annum less that an allocated space? Who will have responsibility for responding to complaints that "someone else has parked in my space"? This could turn into an administrative burden pretty quickly. Are the cost / benefit to IOM Government figures to be made public? It is not clear whether the Scheme is to be cost neutral, or whether costs/benefits have been considered only from the point of view of a single Department.
DHSC	General	I work in the radiology department at the hospital and work 9-5 every work day. Sometimes if I know there is going to be no parking spaces at the back of the hospital- Mon, Tues Wed, I park in the overflow carpark near the field. There is always at least 30 spaces free at 8.50am. If the reason for parking payments is to stop some people from parking when they are not actually using the hospital (some people park at hospital and catch the bus to the shops in Douglas) then it's really not an issue because there are so many spots in the overflow car park, staff just don't want to walk further. My problem with parking there is that I don't like going out there after 5pm at the moment because it is dark once you step off the lighted footpath If it's to make money then I understand. But do all the car park areas need to be charged? Will staff pay less then patients (I'm assuming they will because the proposal is suggesting £275 per Annum). Will the Isle of Man government change the bus services so people coming from Douglas don't have to be in an hour before hand to make it to work at 9am, because it will be cheaper for most staff to get the bus. The 5/6 from Douglas to Peel

DED	Fairness	• This is a completely arbitrary and unfair way of introducing charges on a proportion of the workforce who happen to be located within the disc zone area because that is where their particular office is based. Others i.e Education at Hamilton House, teachers at schools, nurses at the very congested Nobles Hospital all get a space completely free. Presumably the Manx Utility Authority staff at the business park and at Tromode park free too. Indeed at the business park the MUA currently have a planning application in to spend capital to create a small number of additional spaces!
		• I agree completely that disabled persons should be given some priority for a space if they want it but why should that be provided free especially if they are earning a wage similar to their counterparts. Also they already get some concessions on the streets.
		• The system will be very difficult to administer and will be divisive. In DED we have a lot of active people and establishing the respective priorities for a space will be very difficult. You cannot assess just on volume of trips out alone. One visit could result in major economic benefits being generated and far outweigh the numerous visits of others. In my view this will be inconsistently applied across Government.
		• The outcome of this will have a further detrimental effect on staff the moral of which is already low. We will lose some staff to opportunities that arise in other Departments where parking is free.
		• If parking is to be introduced for civil service staff then it should be done across the board to everybody in all Departments.
		As you will appreciate at this point in my career I can live with most proposals. But I would like to see a Civil Service left that is attractive to young people as a career. The employment profile in the Civil Service already shows it heavily weighted in the 45 – 60 bracket and not many young people at all. This doesn't make us attractive.
DED - Motorsport	Fairness	Employers provide parking for employees because they wish to ensure that their employees can get to work; do not have the concern about where to park when they get to work and do not do what many DED employees do – frequently leave the workplace to move their car or adjust their parking disk. There are good reasons for not viewing parking places as a perk but as a sensible employment policy.
		I am drawn to ask why so many public servants are working in central Douglas. Modern technology and the fact that most of us do what I am doing now – communicating by email – make the location of where we are employed less important than it ever was. I could be writing this email from Smeale, Peel, Port St Mary or Sydney Australia; you would still receive it and in the same timescale. The main reason why are located in central Douglas offices is for the convenience of politicians who are accommodated in Government Buildings, in the centre of Douglas. I work in DED offices in the centre of Douglas not as a matter of my choice but for the convenience of others. Making me pay for parking when I have no option but to use my car to get here is as indefensible as giving me a free parking space.
		My last point is that I used to work in Jurby, where I had a free parking space. I was still a civil servant. Treating civil servants in the centre of Douglas differently than civil servants who happen to work outside of Douglas is unfair. Whatever this policy is designed to achieve, it is not fairness. The policy, as presented, should not use the word "fair" to justify it when it actually has nothing to do with it. If Government should be anything, it should not be disingenuous.

DED - Motorsport	Fees	Firstly I recognise that this is a politically inspired policy where it has been determined that public servants must pay as part of the ongoing theme that public servants are overpaid and over-valued. I have every expectation that the policy will be implemented, whatever public servants might think. We are being given an opportunity to comment on the proposal rather than contribute to a consultation. In the spirit of commenting I offer the following:
		In terms of the charge itself I recognise that it is not excessive compared with the charges that the public might face should they park in central Douglas. However, it is not unusual for private sector employees to be provided with a parking space (my son, for example, is) with no charge. The policy has to be viewed as an employment issue rather than a comparison with the public's experience when visiting Douglas. Visiting Douglas town centre is often a matter of choice. Coming to work is not. The comparison is irrelevant. Personally I exercise my choice not to come to Douglas to shop or do any other business unless I absolutely have to. Parking is one of the factors that influence this choice. The main reason is that I live in the remote north of the Island.
DHSC	General	I am a community staff nurse who has to provide, tax, insure and maintain a vehicle for the sole purpose of delivering a service to the public. I receive a mileage allowance which is set at the same rate for other government workers who only use their cars for occasional meetings who do not have constant wear and tear on their vehicles and also have the choice to walk, cycle or use public transport to work.
Prison	Fairness	Although this does not affect me, it seems a little unfair that a Government worker who initially takes a post with a car parking space, at a later date indirectly has to take a pay cut, due to the introduction of parking fees. It seems a little reactive and lacking in forward planning.
Treasury	Fairness	I do not agree that it is indefensible for some Govt staff to receive free parking. I would argue that as many employers provide free car parking for their staff it is no different when the Govt, as an employer, provides free parking for some of its staff. However, if they go ahead with the parking charge it should be raised against all government employees, not just those in central Douglas as this is discriminatory and totally unfair.
OHR	Fees	The cost of £275 pa for an allocated space and £220 pa for an undesignated space is very reasonable and is much cheaper than I am currently paying at either Chester St. car park or Shaw's Brow car park .I certainly agree with the recommendation that the policy applies to all Members of Tynwald, Members of staff within the Clerk of Tynwald's Office and Members of the Judiciary and other Crown appointments.
OHR	Fairness	I agree with the principle of the policy and I understand the need for the charges to be made. My only concern is that whatever is agreed is applicable to all unless exempt for legitimate reasons and not because a Department/Board or office disagree with it.

OHR	Part-time staff	Working part time (approx. 6 hours parking required) means that I have to pay the maximum amount of £5 per day in Chester St car park as the maximum charge applies for parking of 4 hours or more. Shaw's Brow car park is less costly and would work out at £3.40 per day if there were any spaces left however, when I get into town at approximately 9.15am, they are all taken. Public transport is also not an option for me from Onchan as the bus timetables are not geared for working mums. If the timetables were more accommodating this would be my preferred 'greener' option.
DHSC	General	One other comment is that there are a lot of spaces on the apron car park on the second floor of Chester Street car park (where CIRCA & Shopmobility offices are) and it seems Government workers get permits where they can park there 7 days a week. It wouldn't seem necessary for anyone working Monday to Friday to have a 7 day parking space which would preclude revenue from members of the public paying for spaces while shopping at the weekend.
DED	Fees	Briefly, please be advised that I would be willing to pay up to £275 annually for a designated parking space, provided that space were in St. George's Court. If I were allocated a space elsewhere, hence requiring a walk in the rain to reach my office, there would be no point in paying for a space and I would continue to come into work on bicycle most days, paying for public parking on the rare days I use my car.
Cabinet Office	Fairness	On the whole, I think that the Consultation document looks reasonable, and I would be quite happy to pay the recommended tariff for a parking space. It would be disappointing if the final Policy could not be applied to everyone, including political members (especially those who hold ministerial office – should they park free while their colleagues in the same Department are paying?).
FSC	Fairness	Firstly, I would like to note that this consultation feels very much like a done deal due to a very short time frame before implementation on 1 April 2015. I feel that this is an unfair charge and is effectively a pay cut which comes on top of less than inflation pay rises and increased pension costsI also use my car for site visits (less than weekly) I have not always claimed the petrol charges as realised that in some instances it would cost more to process and I know of others who do the same. If I then have to pay for my car parking I would be less inclined not to charge which in my opinion could cost the tax payer more. We are under no obligation to use our cars for site visits but do so as we recognised that there would be a time cost if we had to use a bus. Again not the best use of tax payer funds. There is no general public access to the FSC and don't know of anyone who has had to pay for parking whilst attending a meeting at our offices. There are lots of private sector employers who offer car parking as part of a package this is nothing new.
		It is also totally unfair the employees working in Douglas are being penalised just because their place of work happens to be in Douglas

FSC		Although not specifically stated in our terms and conditions a car park space was advertised with the job, and at interview I was advised that a car park is allocated after a 12 month period and that is indeed what happened. Our staff handbook states the following: The Commission's car parking policy is based on seniority firstly and thereafter length of service as follows: Chief Executive & HOD's Car parking allocation All posts in this band should be allocated an on-site space as part of package Band D All posts in this band should be allocated an on-site space as part of package Band C Permanent space should be allocated after 1 years service Band B Permanent space should be allocated after 2 years service Band A Permanent space should be allocated after 3 years service
FSc	Management of spaces	Also, the consultation does not detail how it would work operationally , for example a designated or non- designated space, how would this work in practice if you choose the cheaper option would there be 10 non-designated spaces for 10 individuals.
DEC	Fees	I fully appreciate that the present car parking arrangements are a privilege and not a right and it would be difficult to argue against a case to charge a fee for those staff who currently enjoy free and guaranteed allocated parking spaces, as by enlarge those staff tend to be on the higher pay scales.
DEC	Management of spaces	It would be interesting to know how the proposal regarding undesignated parking would be implemented, for example how can you charge a staff member £220 per annum for a parking space that is undesignated/ unallocated when most such spaces are on a first come first served basis and not guaranteed.
DEC	Fairness	I am led to believe that the proposed fees are £275 per annum for an allocated space and a fee of £220 for an undesignated space. If that is the case, then I fail to see the logic in such an arrangement. For example to senior officer on say £90,000 per annum with a guaranteed parking space would pay a mere £55 per year more that say a part time worker or junior officer on say £18,000 per annum I fail to see how that is proportionate or fair. It appears to be a case of the lowest paid grades with the least ability to pay shouldering the greatest burden. If the government is determined to introduce these parking arrangements then they should be revisited to ensure that they are fair and proportionate and are at least based around some degree on the basis of the ability to pay.

General Registry	Fairness	 Whilst the proposed imposition of car parking charges upon Public Servants is an understandable consideration in the current financial climate and the public demand for such is understandable given the very negative public perception of Civil Servants portrayed by our employers and politicians, in practical terms its imposition amounts to a further reduction in pay and conditions affecting only certain staff, following on from previous and further planned reductions such as: Increased Pension contributions Increased NI contributions C. Below inflation pay increases (meaning a real term reduction) Further planned changes to Pension arrangements Reduction in terms and conditions for new starters, including for those moving into new posts It should also be noted that changes to the Tax regime such as in relation to Mortgage Interest Relief have also resulted in further reductions in income Whilst it would be easy to see those issues as unrealistic rants in the current climate, the implications for those issues and other changes taking place are: Significant reduction in morale and motivation Increased versions and early retirements from key and higher performing staff Increased versions and early retirements issues Specifically in relation to car parking, staff may reasonably refuse to use their own vehicle for business purposes (and therefore give up their space), the implications of which is that the departments will have to provide and fund alternative means of transportation 2. As a matter of principal staff requiring to use their vehicle for work/business purposes should be provided with a free parking space
General Registry	Applicability	4. Tynwald members whose place of departmental work is in Douglas, should not have a further free parking place elsewhere
General Registry	Sub-letting	5. On a practical basis the annual charge will presumably entitle the recipient to 365 days, 24 hour access to the parking space, and the ability to sub-let the space for periods of leave/absence etc.
General Registry	General	6. It should be noted that not all requirements for business use of a vehicle or parking space are or can be planned, including call-out requirements, off site meetings etc. and that if such staff no longer have access to a space, departments will again have to provide and fund alternative means of transportation Please note that the views expressed within this document are entirely my own personal views.

DHSC		In the email accompanying the consultation document, it states "there will be no charge for essential users" – I can't see any mention of essential users in the policy, and what is an essential user?
DHSC	spaces	If you choose to pay the lower £220 fee and have an undesignated space, how will this work? What are you paying for, as I would imagine often there will be nowhere to park even though you've paid – it's not designated so you will be 'allocated by the accounting officer'? And therefore no better off than not paying any fee?
DEC	Fairness	I will no doubt echo what I believe most people have said in that I believe the inequitable way in which it is proposed these spaces are paid for is unfair. As usual the higher up you are in Government the more perks for less you get. Those at the bottom of the ladder, pay more with more inconvenience. I also find it bizarre that you propose to charge £220 for a car parking space that you are not guaranteed to get. As a lot of working mothers have to drop off children prior to work. It would probably mean that by the time I get to work, the limited spaces I have paid for would all be used up.You say the main aim of the policy is to ensure it is fair, proportionate and cost effective. I truly believe the current one set out in your email is neither fair or proportionate.
IPA	Fees	With reference to the proposed parking fees for public sector parking – I cannot see why it should not be increased to £550. annually – as this Would still bring it in under the cheapest parking fee of £3.50 per day. This would amount to £2.00 per day which is still cheaper than parking in a public car park all day. After all the purpose of this exercise is to bring in extra revenue for the treasury.
	General	 Where the Government owns the land and is not incurring lease costs I believe parking should continue to be free for those Government workers who are in this fortunate position. Some private sector companies provide free parking as a benefit and where there is no cost to Government why shouldn't they as employers? I accept the Government should not be incurring any expense for land or spaces it leases. The proposed policy seems inconsistent. Are any other parking spaces leased at a cost by the Government for staff outside central Douglas? The public are charged for parking elsewhere on the Island and are also subject to disc zones so why solely choose Douglas?
		 Free parking has been a perceived benefit for those Government staff who have been fortunate enough to receive it and as such would have viewed it as part of the 'package'. Should they be charged for parking they would be in effect be receiving a reduction in their salary. If the Department is over budget I believe it should continue to cut expenditure rather than constantly trying to increase income (indirect taxation). Government staff do not choose whether they will be working in a central Douglas office or elsewhere. They are not deliberately parking in central Douglas. If the Government wants to dis-encourage this practice they should consider relocating its Departments elsewhere.

	Management of spaces	What penalties, checks and enforcement/sanction would be proposed? At what cost?
		I believe any cost saving may not be as great as initially envisaged if the wider Government picture is considered. Inevitably a proportion of employees will park on the street to avoid any charge and lost productivity should be considered factored in here, in relation for the time it takes staff to move their vehicles and change their discs. In addition this will take up already limited disc parking.
DHA		Why should Government workers be suddenly penalised for working in Central Douglas? Those in the private sector took employment with various companies knowing that no car parking was provided and they would have to pay for the facility. Those already employed in Government took employment with the knowledge that car parking was provided. Now charging for parking would seem like a pay cut as it is a new charge that won't have been budgeted for. I would imagine that the land used for Government car parking is owned and not leased and therefore no additional cost has been incurred by Government. Why should workers therefore pay for something that their employers are not incurring? Again, this would effectively be a pay cut. To effectively reduce the pay of Government workers is unacceptable. Those working in Government are often paid less than those in the private sector. Why effectively tax lower paid workers more at a time when those on lower pay are being hit the hardest with no pay increases, no bonuses like in the private sector and those that often work anti-social hours? Having paid parking is one of the few benefits of working for Government.
DHA	spaces	How is this going to be policed? Surely the cost of policing Government parking spaces will incur costs which would significantly reduce any revenue gained. The risk of charging for Government parking spaces is that more cars will be pushed onto the already clogged up roads around central Douglas. More people will be moving cars after the 2 hour disc parking, again with the effect of increasing traffic on the roads.
		Also the proposal states that charges depend on whether you are full or part time but in Appendix B it states that charges will be pro- rata for staff working less than 0.5 f.t.e - can this be explained ? Does this exclude any other part time workers of 0.5 or above I have a particular interest in the above as I work mornings only as a 0.5 so under the proposal would presumably have to pay full price for half a day which seems unfair
		In regards to the car parking charges as the government owns the car parks why is there a need to charge staff for something the government owns? Also if funding is needed for maintenance then charges should be paid for as they are used, not in advance and then refund costs. This would allow flexibility for staff using the car parks that they would pay as they use the car park such as for purchase of tokens which could be used for either entry or exiting the car park this would be a more fair system.
Chamber of Commerce	Fees	I would however just note that the DoI consultation merely asked about the principle of charging or not charging - not the considerable under market value of the charges.
		There is a rumour going round that only higher executive officers and above will have the option to pay for a parking space. But the policy is said to apply to all civil servants and so after essential users have been dealt with the option to pay for a parking space should be available to all grades.
		Likewise if a parking space is available because of annual leave for example it should be offered to other staff regardless of grade.
		The difference between grades is in the pay structure and should not be in more favourable conditions of work

	spaces	But surely to achieve fairness across the Departments specific guidance should be issued. It would be wrong if one Department has a blanket ban on lower grades having a parking space and other Departments do not. So the across government guidance could state than an automatic ban on lower grades applying for a parking space is not allowed. 1.Will there be some sort of check to see that the policy is being applied in a similar fashion across government ? 2. Will Staff/ the government officers association be able to compare the parking policy of different departments to see if any department is adopting a completely different approach to others? 3. If the allocation of spaces is felt to be unfair will there be somewhere staff can go after exhausting any Departmental avenues?
	Мар	having read through the consultation and looked at the map supplied it is very unclear which car parks and parking spaces are included. I work at the Government Laboratory at Old Nobles – I cannot determine if the car parks here are included. As with all public consultations a clear and unambiguous statement of aims etc should be included – this map supplied is absolutely useless and provides no guidance at all.
		 As for charging for car parking I have the following issues. 1) I live in a rural community 15 miles from Douglas with little option but to drive to work 2) I regularly use my own vehicle for work purposes as the lab only has access to one pool vehicle 3) The allocation of free spaces only being available for those who use own car for work on a daily basis – this is clearly unfair as I am still required to use my car if called to do so this might not happen daily but a couple times a week. What am I supposed to do? Guess when I might be called out? 4) The restrictive nature of the permits does not encourage car sharing or seeking alternative means of transport. 5) The fee arrangements re full or PT staff are not equitable 6) Why only Douglas employees? Seems hardly fair not as if I chose to build the lab in Douglas?
General Registry		Has the resource implications (time/cost) required of Departments to manage and police the proposed policy on an annual basis been fully considered; this idea seems to fly in the face of CoMIN's current policy to streamline and reduce the size of the Government by
General Registry	Fairness	Seems a bit unfair to charge staff based on the location of their job, i.e. in this case, in the Douglas disc zone. Surely all parking spaces are a valuable resource regardless of location.
General Registry	spaces	Maybe, the bigger picture stuff, that we are not always party to, makes for a good argument in favour of the proposed policy, but this does seem to be a rather low level priority on the list of important changes the Government needs to make. As a manager, I see myself as an essential component of the necessary and difficult changes being implemented across the Isle of Man Government and this proposal could become an unnecessary distraction

МНК	Fairness	Re Consultation for Car parking charges for government staff using government owned land.
		The whole thing is upside down as far as I am concerned. You can't have charging for some and many others exempt. It is also putting a further 'charge burden' on Public Service employees. Road Tax has gone up, bus fare charging for kids, Airport and many other charging increases across Government.
		If you are not going to charge for teachers (I assume the likes of Ballakermeen and St. Ninians fall into this) amongst others, then its 'all or nothing.' However, I don't know of other organisations charging their employees?
		I have to say the reasoning used in the consultation document is demeaning. The real reason is to solely raise revenue.
DHSC	Мар	Have you got a better map please or can you confirm the position ref spaces at Crookall House?
DHSC	Fairness) The policy only involves employees working within the disc parking zone in central Douglas – why are these being targeted?
		2) This feels like those working within the disc zone areas are being discriminated, surely this should be across the whole of the Public Sector/Government! As employees we don't get to have a say where our places of work are located.5) I believe that the paying for disc by households has now been dismissed.
DHSC	Management of spaces	If a person pays for an allocated space, they pay extra for this rather than an unallocated space. I don't understand why the space should be reallocated for somebody else to use in their absence, even if it's for one day. The government has been paid for this space already. The document states you can only apply for a rebate if you are off sick for 6 weeks or more, so if a person was on leave for two weeks, the allocated space holder would be paying out of their wages for somebody else to be allocated their space for the duration of their leave. It clearly says that spaces cannot be sub-let, so this doesn't add up.
DHSC	Fees	I totally appreciate the need to have disabled parking spaces available for both staff and visitors. These spaces should be close to the doors, and be available for staff who are registered disabled to have them allocated to them. I personally feel that the spaces should also be chargeable.
DHSC	General	Here are my comments regarding parking. Finally, car parks should be made secure. Barriers should be introduced with access card entry and tokens for visitors to exit. We have a problem where people who are not visiting our building, park in our car park. They are parking in our car park to drop off, or collect their children from the nearby school. There are signs at the entrance, but this is totally ignored. If people are paying for the use of parking spaces either allocated or unallocated, the spaces need to be protected so they are always available.
FSC	General	I am satisfied with the level of car parking charges now suggested, but I fear that the Government may have plans to increase these beyond RPI in future (I am concerned they have been lowered 'temporarily' only to be increased exponentially in future). It would be useful if the policy document referred to increases only ever being RPI equivalent.

FSC	Cost Benefit	I have concerns over the allocation document and red tape – I think the consultation has majored on the allocation, when in fact it is the fee income that Government really is concerned about. There is a danger that the allocation red tape will negate the benefit of any fee income.
FSC	Fairness	In my case, thankfully, my terms and conditions grant me a parking space – but I still have concerns about the erosion of benefits in general. Government workers have always been an easy target – when employed initially you are told wages don't match those of equivalent industry roles, but that's due to the benefits like pension, etc. Then over the years the pension costs have grown, and are likely to grow again, retirement ages change, meanwhile parking charges, a pay freeze etc There is a lot of disenchantment, and broken promises.
	Fairness	 I would be grateful if my comments could be considered as part of the consultation for the above Policy. This could be seen as yet another indirect tax rather than the stated aim to ensure that the provision of car parking for public servants based in central Douglas disc zones is fair, proportionate and cost effective. Many private sector workers are provided with free parking by their employers. It is probable that the majority of public servants classified as "Essential Users" would be those at the higher grades and rates of pay, thus this policy would impact most on lower paid employees who may already be struggling financially and are less likely to need to use their own vehicles for business outside the main place of work.

Aircraft Registry		I would just like to provide a bit of feedback regarding the proposed charging for government parking spaces.
	remuneration	I currently have a parking space within St Coorges Court, this parking space was offered and assented as part of my terms and
	package	I currently have a parking space within St Georges Court, this parking space was offered and accepted as part of my terms and conditions when I accepted my currently position as an airworthiness surveyor.
		My current roles regards includes providing regulatory advice and assistance to our fleet of 454 aircraft, the understanding was I would be offered a car parking space based on the fact I may need to assist and aircraft which has technical issues and may involve coming into work outside of my normal working hours.
		We are often face aircraft with technical issues on a daily basis; some of these occasions involve staying after work to complete the necessary permission for the aircraft to continue in service; having the car parked down stairs eliminates any issue of public transport and other parking concerns should I be kept late.
		Should the car parking policy change and I am made to pay for my parking space; I will have no option but to give up my parking space and resort to another way to commute to and from work leaving my car at home.
		The will have a severe knock on effect on the business model of the IOMAR globally, which may result in losing aircrafts to another register due to our non-flexibility. High net worth individuals will have to wait 24/48 hours until the office reopens before there aircraft can obtain the necessary permission/documents from us.
		We will no longer be in a position to offer;
		• Extended hour's regulatory cover, including weekdays after 17:30 and weekends.
		• We could only offer Isle of Man based aircraft surveys should a pool car be available.
		The IOMAR is competing on a global scale and currently has one of the best reputations for customer delivery and service, hopefully this will be recognised government and the correct decision will be made regarding our parking allocation; allowing us to continue our flexible approach and provide the necessary regulatory support.
		If you have any questions please do not hesitate to contact the aircraft registry using the general email address aircraft@gov.im or for urgent enquires +44 1624 682 358.
Civil Service	Fees	The policy indicates that the Department of Infrastructure is going to charge Departments for spaces in the central Douglas disc zone. Will this charge be based on the level of cross charging or is it the intention of the Department to charge the £275 figure per space regardless of the ability to cross charge. Also will the policy include schools which are within the disc zone area.

Civil Service	Management of spaces	As an Accounting Officer there is sufficient work to be done without annually having to undertake a car parking space application exercise. Any application will have to be fully considered and with the right of appeal reviewing those decisions. If a parking policy is introduced it should be a matter for the Accounting Officer to determine how spaces are filled and the review of those spaces which is how it is done now with the ** parking document available to staff. I cannot imagine that all the private sector businesses which have parking spaces available would go through an exercise proposed in the draft policy.
Civil Service	Fairness	The policy proposes that agency/contract staff will not be subject to the charges. This appears unfair to other staff, if they are being allocated a space then there should be a charge if the policy is being introduced. Currently, the policy as drafted would mean that staff on 3 year contracts would be exempt from paying.
DED	Fairness	No evidence has been provided that the public are being disadvantaged by the existing parking arrangements. A number of private companies provide parking for staff, it is unclear why public servants are being targeted to be treated differently especially at a time of pay constraints, proposed changes to payscales and concerns on pensions costs and benefits. Some staff have expressed concern that public servants in Douglas are being unfairly treated against those who work elsewhere. It is not their choice of where the office is located and in some cases there is little physical difference in location between those who would pay and those who won't e.g. Hamilton House is in Douglas but outside the charge zone. The ring around Douglas for pay/ don't pay is seen as arbitrary. Either all pay or none pay is how it has been put forward by some staff.
DED	Cost Benefit	The administration involved is likely to be considerable, is this really cost effective? Even for single occupier spaces this seems potentially bureaucratic and DED has some spaces where 3 staff share one space. Based on the draft provided this will require 3 submissions for parking spaces (each needing applicant and signature resourcing) and 3 separate forms for deduction from salary (no idea how complicated this is to apply for, approve and administer), all for £275 a year (with a requirement for annual review). As a minimum the process, as it's new, should be required to be online with no paper submissions or paper trails. 4. The aim to move people out of cars is admirable but the proposal may simply move those who have a free parking space onto the street which will actually reduce public parking in Douglas. Staff will move vehicles during the day wasting time and blocking spaces.
DED	Fairness	7. Some buildings have allocated spaces as part of their lease agreements. These may be difficult, impossible or costly to cancel if staff do not take them up. These are not generally available to the public so have little or no impact unless staff move to free parking on street (see 4).
Treasury	Fairness	 That the fees of £220 and £275 (and pro rata) remain the same or increase at the same rate as wages for 5 years or other substantive period. That a salary increase for workers within the pay-zone is introduced, a bit like 'London Weighting'. That the fees remain at the discretion of Accounting Officers of respective Divisions/Departments (who have the spaces) to fund them from their own budgets without impacting upon staff. Please bear in mind that the continual use of Civil Servants as a Governmental cost reduction tool does nothing for morale and reduces the incentive to embark upon a job (let alone career) with what was once considered an honourable and sought after employer. Please provide evidence (minutes or similar documentation) that the above has been included and considered as requested.

IOMFT	Applicability	I feel that if this is implemented then it should be implemented across the whole of Government not just those in central Douglas.
IOMOFT	Fairness	We have quite a few employed here who when interviewed for their jobs, a part of their contract states that they must have a car available for work, so in some cases they are paying a premium on their car insurance, and will now be asked to pay more, and I know of some Officers who use their cars on official business but do not claim mileage.
		It seems a little unjust that officers outside of the disc zones will not have to pay, even though many will be using works car parks (DEFA, MUA, DOI Hills Meadow, etc.).
		What will happen if a worker is based outside the Douglas Disc Zone but then had to travel into Douglas for a meeting, if he parks in a Government space will they incur a fee for parking?
		Why are the Officers based in Central Douglas being singled out?
		In real terms our pay packet is falling as our pension payments rise each year (with no guarantee of getting the pension promised), our wages have not kept up with the rate of inflation, only now is it starting to fall with the drop in petrol prices.
		For those on high wages £275 may not be a lot to lose, but for those on lower grades it can be the difference between keeping your head above water or just surviving.
		If you are going to bring in parking fees then it must be fair, across the whole of Government (MHK's and MLC's) and not just the ones unlucky enough to be working in central Douglas.
DED	Applicability	Whilst I do not qualify for a 'Free' government parking space, I should like to advise that I feel aggrieved that civil service personnel who have been forced to work within Douglas Town Centre due to various office moves are being penalised. Before our office move we did have use of free parking and if we were still in the building we would not be paying now as we were not in the 'Town Centre'.
		If charging is to be considered then it should be considered for ALL staff right across the board, whether they work at the hospital, fire and police station, schools, leisure centres, the DOI at the sea terminal and all other government places of work right across the island employing staff.
DED	Fairness	With all the other change proposals, it seems most unfair that those that work in Douglas Centre are penalised through the higher car parking charges imposed by Douglas Corporation and the Government public car parks.
		Surely spaces whether paid for or not should only be provided to those people who genuinely use a vehicle for work in carrying out their public service duties AND they should only be using their own vehicle when a pool car is not available.
		Perhaps spaces whether paid or unpaid should be limited to those people that live at least 3 miles away from their place of work so as to encourage better use of public transport, healthy options to get to work.

DED		 In response to he Governments Policy for Car Parking from April 1st 2015 the undersigned has the following opinion: I am in agreement that due to the Current Economic and financial limitations on Government that there is no reason why Civil Servants/Government employees should not have to pay for the privilege of parking and in this regard be treated differently to other parking users who have to pay for this advantage. This being said and having considered the following statement" consideration by Chief Officers and the Council of Ministers a draft policy has been developed which sets out the process for the allocation and charging of available parking spaces, to ensure that this is fair, consistent and transparent
DED		The undersigned was previously located at Peregrine House within the Ship Registry up and until January 2011 when we as the Registry were moved to St Georges' Court; this move was decided by the then minister; we as employees had no choice. I note that Peregrine House is now used by the Dept of Infrastructure and the users will be exempted from the parking charge as they are outside the parking Zone. This is a benefit to them and a detriment to Ship Registry workers in the Douglas Parking zone. Surely this cannot be fair, just or reasonable to treat one set of employees different to others in the name of the aforementioned Policy who enjoy the same facility? As I opined, the undersigned is happy to make a payment for the parking facility but do feel that the policy should apply across Government for this privilege and not to just the Employees within the Douglas Parking Zone.
DED		We at the Ship Registry were moved from outside the disc Zone to inside the disc Zone four years ago at the Governments behest not ours. Why now should we have parking costs imposed upon us? I personally am not averse to paying for parking but my view is if one has to pay we should all have to pay regardless where our office be situated.
DED	Fairness	It is geared towards the regular full-time workers using their cars every day.
DED	spaces	It necessitates the need for a number of 'accounting officers' in every division. I have had an allocated space previously. All of my colleagues in the same position would offer these spaces up on the days when we were to be absent. There was no need for an accounting officer to work this all out for us. 3. I currently leave early on Wednesday and Thursday but as work requires I often stay later and occasionally come in on a Friday. When working my normal hours, I immediately free up a space when I leave and I do not have to worry about car parking entitlements if I am required to work longer than my normal hours. I occasionally use my car for work purposes to attend meetings away from the Office/site visits. I would be more inclined to claim for petrol if I was made to pay unreasonable fees for parking.
DED		This point deserves a line to itself: the cycling facilities at the Sea Terminal are below standard. I have to park my bike at the front of the Sea Terminal alongside the road. Some of the metal props are too wide and my bike regularly tilts over. I need to carry 2 heavy locks to ensure it is relatively secure. I am not insisting on showers for workers but how about a secure undercover bike area for staff? Or even just a secure area for staff bikes?!

DED	Fairness	I think each place of work needs to be assessed individually. I think staff need to be thought of as individuals. If there is a desire to squeeze every last ounce of staff 'perks' out of civil servants, the result will be; plummeting staff moral, complicated parking fees which are difficult and painful and expensive to administer; car parking spaces lying empty because no one will want to give them up or have not been able to contact their accounting officer.
DED	General	I currently have a permit to park at the Sea Terminal. I work 25 hours a week spread over 4 days. I generally leave early to mid- afternoon on a Wednesday and Thursday. Between April and October I use my bike generally 2 days per week. I have a number of concerns about the charging regime:
		 4. The fees are seen to encourage people to move away from using their cars. When the weather is good and the evenings are light, I will cycle. Am I really going to be made to pay for parking when I am cycling in?! Do I really have to ring my accounting officer every time I decide to do so? This scheme is not going to encourage me to get on my bike if I have to weigh this up against paid up parking fees. There are many risks to this, one of them being an allocated space sitting unused because I decide to use a more sustainable mode of transport for work. 7. Please consider using an online survey for further consultations; we use SNAP over here in Policy and it is used elsewhere in
		Government. It makes inputting and analysing responses much easier.
	Applicability	I have a number of points to make: • The assumption is that the policy applies to all Government and Crown employees including Teachers, Police, medical staff – it would be grossly unfair if it did not
	Definitions	"Update" refers to the policy recommending that there be no charge for essential users, yet there is no reference to 'essential user' in the exemptions in Appendix B.
	across	 Will all staff be charged directly via payroll or will individual Departments decide whether to recharge staff or not? It would be grossly unfair if some staff (potentially in the same building) were charged and others were not depending on which Department they worked for. Will charges apply to all staff regardless of salary?
	Мар	The map does not clearly define the Central Douglas Disc Parking Zone in which the charges will be applied. So it is unclear if some car parks are included in the charging.
	Mileage claims	By giving a discount to frequent users of their own vehicles for business use is there a risk that use of pool vehicles will diminish and increases in mileage claims as staff seek to become eligible for discounts – thus costing the Government more. Could some staff start using vehicles for short trips in Central Douglas rather than walking in order to qualify for discounts?
DHSC - Community	Definitions	Would you be able to clarify who are considered as "essential users", please? I am interested from a Health & Social Care Community personnel aspect of this decision, e.g. some of my members are based in Loch Prom Practice & Murray's Road & I wonder how this will affect them.

	Fairness	It should not be used simply to raise revenue to prop up a department, i.e. It currently looks as if it bringing more income by taxing
		their own staff.
		2) It should be fairly applied across Government. The Central Douglas tax disc area excuse is effectively a smoke screen to bring in
		To summarise – If you are going to bring in charges for car parking then it must be across Government as a whole, at least in the buildings that are not owned by the Government and it must be simple – perhaps zoned as to where you have to commute from.
Personal	Applicability	This policy applies across all areas of the Isle of Man Public Service.
		Obviously NOT all areas of Public Service, only to those based in Douglas , how is that fair .

DOI	Fairness	Thank you for giving me an opportunity to comment on the staff parking consultation document my views are as follows:
		The premise on which the policy is set is not accurate, fair or consistent The Aim of the policy is disingenuous
		The Department of Infrastructure's public consultation on car parking proposals undertaken in June 2014 highlighted the possibility of charging staff for parking at Government buildings. This document stated:
		"This document is part of an ongoing consultation with the public on how best to meet the large scale budgetary challenge facing the Department of Infrastructure. The Department is responsible for achieving cost savings of £5 million in the current financial year. This is half of Government's overall target for 2014-15 and is an 11% reduction in the Department's budget."
		It is clear these proposals were about revenue generation to balance the Department's budgetary challenges. In January Tynwald the Minister for Infrastructure was given approval to increase vehicle duty by more than inflation to meet these budgetary challenges to remove the need to charge for parking in the Douglas disc zone. It is now clear Government employees are being asked to pay this higher road duty and pay for parking their vehicles at work to retain free resident and on street public parking in the Douglas disc zone.
		This is not fair, proportionate and cost effective
		The aim on page 2 specifically is targeted at public servants who are base within the central Douglas disc zone. However, it goes on to state:
		"It is recommended that this policy is applied to all Members of Tynwald, Members of Staff within the Clerk of Tynwald's Offices and members of the Judiciary and other Crown appointments"
		To be fair the policy must be consistently apply to all persons employed or receiving a salary to serve the public (the term public servant is broader than civil servant). Unfortunately, this policy is based on geography only and may not apply to some public servants dependent upon who they work for rather than their requirement to travel in connection with their employment. In addition, no evidence based criteria has been provided to meet the proportionate or cost effective aims and it is impossible to judge how this is being achieved by the policy.
		In conclusion, no evidence exists to support the fair, proportionate or cost effective aims of this policy. Instead the aim is to reduce staff salaries/increase Government bus income dependent upon which Department they work for in the Douglas area.
IOMOFT	Fairness	I work at the Office of Fair Trading where car parking is available for all staff.
		I am in agreement that a charge, as outlined in the consultation document, should be made for such benefit – I am grateful for the

IOMOFT	Applicability	If the charge is introduced then it should apply to all Members of Tynwald, staff at the Clerk of Tynwald's Office and members of the judiciary and other Crown appointments as well as to public servants.
DOI	General	In response to the Consultation on 'Policy for Allocation and Charging for Government Car Parking' I have the following comments. At the Sea Terminal Building, the public are not charged by the Department for the use of the car park, therefore, why should staff be charged. I also, find difficulty in the allocation of spaces within the Sea Terminal Car Park. At present the entire car park is available for public use. If staff are allocated specific car park spaces, theoretically the number of spaces available to the public may decrease which may, in turn, cause contention amongst the general public and businesses situated within the terminal building. I understand that a recent public consultation conducted by the DoI titled 'Consultation on proposed changes to Public Transport and Parking' found that the majority of respondents did not agree with parking fees for Government Staff, I therefore fail to understand how the Department has concluded that staff in Central Douglas should pay for parking, in essence the fees merely disguise a pay cut to those staff affected by the proposed charges. Additionally, it would appear that the Department has already drawn conclusions on the staff parking policy and the scale of fees, as the application form has already been drafted is the policy even up for discussion?

DOI	General	I have worked in two different sites in Douglas over the last 9 years and for 5 years had to pay everyday for parking and for 4 years have not. A charge of £275 for allocated parking sounds reasonable and fair. However, reading on in the consultation the allocation of a car parking space will be based on the cars that are most used for travel during the day not to guarantee a space close to my place of work. Part of the reasoning is to persuade car sharing, use of public transport or encouraging bicycle use.
GSC	Management of	Having considered the consultation proposed the GSC has no objections in relation to being expected to pay a fee for facilities it is
	spaces	using – in this case a number of car parking spaces. Equally the GSC has no objection to the level of the fees proposed per space.
FSC	Consultation	The "consultation" is not in a format I would expect for a matter supposedly open for input and consideration. It comes across as a "done deal" which is not appropriate.
FSC	Travel alternatives	It is indicated that one reason for charging is to encourage the use of public transport. I live in Sulby and the opportunities for using public transport which does not take hours is limited.
FSC		As a long-standing member of staff at the Commission (in excess of 25 years) it has been my understanding that, after a period of time (which elapsed some time ago) a car parking space would be provided as part of my package. There has never been any suggestion that this would incur a fee and I would strongly resist such a change to these conditions.
FSC	Fairness	This is yet another "tax" being imposed on the hard working public. We are expected to take on significantly more work, with no pay rises, with our pensions being reduced on an ongoing basis! This is the thin edge of the wedge and I must protect strongly against the proposals on this basis.
FSC	Cost Benefit	Given the amount of money to be collected for the spaces and the administration associated with both the collection and the allocation of spaces, it is highly likely that the costs would outweigh any benefit. I do not consider that this is a good use of Government resources – particularly given other recent initiatives which, when promulgated and received resistance, were
FSC	Fees	What are the proposals for future increases to a more commercial level? Is the fee set so low so as to reduce opposition in order to get the proposal passed only to hike the fees for future years?
FSC	Management of spaces	At the FSC car park there are some areas which are not official spaces and indeed are marked "NO PARKING" but some people in the building (but not in the FSC) use as such. What would happen in these circumstances. It would be entirely unfair if persons had to pay for proper spaces while other people abandon their cars in No parking areas without charge. Any form of policing of this issue would make the whole concept unviable.
FSC	The right to reallocate	I note that the proposals will not allow refunds for periods of less than 6 weeks and do not allow sub-letting. If I am expected to pay for a space – I should have rights over that space and should be able to allocate that to a person of my choosing (with a charge if I choose). I do not expect to pay for something that someone else could use without payment.

FSC	remuneration package	The Commision made a submission relating to car parking in July 2014 and maintains the view stated previously. The Commission has a comprehensive car parking policy which operates effectively. The Commission is mindful of its position of attracting and retainin high quality, technically competent staff. The Commission cannot offer a comprehensive benefits package to atch what may be offere in the finance sector and therefore provising a car parkig space is a proprotionately inexpensive but highly attractive benefit.
DOI		It doesn't seem fair that everyone would be charged the same amount – it should be a percentage of what that person earns - \pounds 240 out of the wages of someone who earns \pounds 24,000 is a lot more than \pounds 240 out of wages of someone who earns \pounds 40,000 + and would be peanuts to a CE's wage of \pounds 120,000/annum. This will do nothing for staff morale – we received a very small wage increase, and now it looks as though that's going to be taken away from us in parking charges.
DOI	Travel alternatives	I sometimes use my car to take boxes of files/collect boxes of filing from a storage garage in Parr Street and the VTC, therefore car sharing would not be feasible as I never know when I am required to go there.
ATL		Concern has been expressed that the policy is not explicit in saying that teachers and support staff are excluded from this proposal - the ATL would like to see this included to allay the concerns of staff.
ATL	•	The map that was sent out as part of the consultation was not very clear, although there was reference to the disc zones which helped to provide some clarity.
DOI		With regards to the map that is attached to the consultation paper indicating the disc zones in and around Douglas, I find it very poor quality for an exercise as important as this. There is no legend with it and the detail is not good - you can't make out the areas on it.
DOI		I work at the Sea Terminal where I park my car in the public car park, which is a 'Disc Zone' and free to the general public. Please can you explain how is it being fair introducing charges to those persons who work there, when the public will still be able to park their cars for free and how can it be fair to charge the lower grades like myself the same as the higher grades. This appears to have changed somewhat since the proposals were first muted.

DOI	alternatives	With regards to using alternative means of transport, there are people who live who in rural areas, they need to use their own transport to get them to and from work. The suggestion of using and relying on public transport and lifts is not always an option. especially if you are car sharing during school holidays. I live in the south of the Island so as suggested in the consultation paper I had a look on the website for car sharing, there were only 2 persons that would possibly have been able to give me a lift – but remembering the schools are on holidays which makes a huge difference to amount of lifts available. These lifts would have only taken me from Castletown and I live in Arbory, so the problem would have arisen as to what to do with my car in Castletown for the rest of the day, knowing that you are extremely limited to where you can park due to the lack of parking facilities. I guess I would have had to try to make alternative arrangements for parking my car. Having to work around lifts and public transport from an employer's point of view will lose the flexibility that staff have within their workplace. The working day will become rigid, revolving around the clock. In the Division where I work we operate on flexi-time which allows us to have time in hand which we are able to use for Doctor and Dentist appointments or any other business that may occur. In these instances staff would possibly take an hour for their appointment, take the flexibility away they would probably lose V_2 day's work which isn't very productive and much more costly. We know from the consultation paper that we are being encouraged to use public transport more or alternatively to car share. In answer to the public transport suggestion why has ''Park & Ride' schemes not been encouraged more. I live in the south of the Island and the traffic is literally one continuous line to and from Douglas, I dare say it must be the same from the other quarters of the Island because everyone has to converge on to Douglas.
DOI	Management of spaces	It is stated that it is intended to provide a fair system for the allocation of parking spaces based on need, in this instance please can you explain how it is going to be fair if you wish to pay for a parking space but your need is not deemed great enough and you are refused – how is that fair. How can it be fair when you have paid for your space and for whatever reason you have to leave the premises or you may be away from work that the Accounting Officer has the right to allocate your space to somebody else leaving you nowhere to park – this can happen quite regularly in the summer months with the boats arriving. As I wrote earlier in my email the Sea Terminal car park is a free public car park so if you pay for a space that is not designated how are you going to stop the public from using your space that you have paid for should you have to for whatever reason to leave the car park.
DOI		When this consultation was launched in January of this year there were a lot issues regarding the introduction of parking charges in disc zones in and around Douglas, this has now been scrapped by Minister Gawne. It was agreed that the revenue lost to the Department through this decision would be compensated through the increase of Vehicle Tax Duty which we all pay. It is much appreciated the Department requires to make huge savings and of course find added income, I was always given to understand that whether you work in the public sector, private sector or even in a voluntary capacity your greatest asset is your workforce and I feel that much greater thought is required to this situation not just for us who work in the public sector but for everyone who has to come into Douglas from the outer towns for work
DHSC		If this is to be brought in, the charge should surely be based on salary and therefore Admin staff at the lower end should pay proportionally less than senior staff; 2. Nothing personally against the disabled, but if you've got two staff at AO grade doing exactly the same job but one is classed as disabled whilst the other one isn't, that's a perk to the disabled person of £275 more per year for free car parking. I don't understand why that would be needed myself; 3. Staff who work unsocial hours invariably already get an enhancement for the hours they do, so why should they be exempt? 4. The same for agency and contract staff, if staff on the payroll have to pay, why should they be treated differently;

DHSC	Cost Benefit	The admin cost of sorting this out is going to be time consuming and costly, and for whoever ends up being 'in charge' at the centre, is going to get lots of questions needing to be answered; Just to finish, I think there will be a lot of good will lost if this is brought in, and whilst we might end up with staff using public transport and having a fleet of pool cars available for their use, less work will be done overall at a cost to IOM Government.
DOI	Fairness	The policy is unfair because it takes n account of the salary or pay grade of individuals. Persons who are required to use their own vehicles for business use already have to pay an increased insurance premium. It is unfair to be then required to pay to park at the business presmises, praticularly when this is at the owner's risk. It is proposed the policy will aply to all relevant public servants and employees within Government, but it is only recommended that it applies (i.e may apply) to 'all members of Tywnald, Members of staff within the Clerk of Tynwald's Office and Members of the Judiciary and other Crown appointments' It is unfair that certain
DOI	Applicability	It discrminates against those persons whose place of work is within the Douglas disc zone. Most have no choice in their place of work, and others have bene relocated recently following reorganisation. Some persons have taken positions on the basis that free parking was available at their workplace. The policy discrminates against persons in the same department, doing similar work, solely on office location. Why should a person based just inside the proposed area have to pay a parking charge whereas a colleague based
DOI	Definitions	The polciy recommends that there be no charge for essential users. However, there is no clear definition of an essential user sin the policy. There is a list of factors to be considered when assigning spaces, but it is unclear if this is to be used in defining an 'essential user'. Some posts require persons to have access to a prviate vehicle. It is a condition of thier person specification. Does this make them an 'essential user'.
DOI	Fees	If, due to personal circumstances a peron can only bring their vehicle to work on an infrequne basis, will the fee be reduced? Where the car park is shared with private companies, is it proposed that their staff and/or coustmers will be charged? If the fee was imposed on all government sites, the fee levied could be significantly reduced. If a fee is paid, is an available space guaranteed?

DOI	General	Charging for parking also brings about limitations to staff which affects their work/life balance
		(i) Parents require a car to carry out drop off/collections for children to school/carers to enable them to work and as we are all aware the limitations of bus timetables and routes would not assist in multiple arrangements.
		(ii) In order to attend dental and doctor/hospital appointments to ensure the minimum amount of time away from work would increase dramatically.
		(iii) Those with elderly people responsibilities would not be able to attend a situation/emergency as and when needed. As well as carry out routine visits after work or during lunchtime.
		3. When being interviewed a regular question from the interview panel is 'are you willing to be flexible to suit meetings or for public consultations – does Government accept this flexibility will no longer exist.
		6. When applying for a post consideration of being able to park is part of the decision making process. My suggestion is 'there will be a charge for future employees'.
		7. Just recently it was stated on the radio that the reduced Government levels meant those that are left are working harder than ever – so why place charges on such hard working people now and at a time when pay increases are hardly noticeable after tax and pension contributions (which again are under review).
		8. Would the cost of a permit be capped for a period of 5 years as this has not been mentioned in the consultation?
DED	General	I would like to add to the consultation by requesting that spaces could be allocated according to our work requirements. I insure my car for business use at my own expense and I attend fishing vessels, the Karina, the Ben-my-chree and the Manannan for survey work, sometimes at short notice. The surveyors also come and go from the airport during the working day according to our travel schedules and I carry a pager as I am on the Peel lifeboat crew.
DHSC	Мар	1) The map issued is extremely poor quality and we could not identify specifically which car parks would be chargeable and which would not. We would therefore like clarity on which car parks in central Douglas would be affected by parking charge.
DHSC	Applicability	The policy only involves employees working within the disc parking zone in central Douglas – why are these being targeted? This feels like those working within the disc zone areas are being discriminated, surely this should be across the whole of the Public Sector/Government! As employees we don't get to have a say where our places of work are located. If this is going to happen then is should be across the whole of the Public Sector and Government i.e. Nobles, Ramsey Cottage Hospital, Prison etc

DHSC		If charges are to be applied could there be some sort of scale such that lower paid employees pay less than more senior managers?) Why are staff on zero hours contracts and Agency/contract staff exempted from the charges?Why is there not proposed to be a charge for motorcycles? They tend to use a whole space when parking. If charges are to be implemented they should be done fairly throughout all government regardless of where you work or what you do. 23) There should be no discrimination between one car park coming under the charges and another being exempt. 24) If staff are to be charged they should be guaranteed a parking space rather than paying nearly the full rate for a space every now and then. 25) If charges are to be applied then having a charge on everyone working in government should be used as a means of reducing the cost of parking charges across the board rather than the contrary – a way of making more money. 26) If charges are to be applied the charges should be pro rata to the individual's earnings. 27) If charges are to be introduced could they first be introduced at a lower rate then scaled up over a period of years.
DHSC	Travel alternatives	A charge for parking will likely lead to fewer people coming to work in their own cars (as per the intended objective). Will the DOI therefore be providing a larger fleet of pool cars for staff use when travelling to meetings etc around the Island?
	-	Will someone be responsible for managing the car parks? If I was paying for a parking space and found someone else had parked in my space what redress would I have? All community nursing staff based at Crookall House have to have the capacity to use a vehicle on a daily basis as staff are dispersed across the Island. Consideration needs to be given to ensure equity for staff as staff do not have a choice in which team they are allocated to therefore it would seem some staff can park free of charge whereas others would need to pay.

Treasury		The Rest I've never read such nonsense! Has nobody done a cost benefit analysis here? How many spaces? How many essential users? What's the likely cash amount to be recovered? What will be the cost of administering all this? Someone will need to keep tabs in each Department of the spaces, the users, the billing and then account for the money. The data released to IOM newspapers suggested 382 spaces (although how many were in the zone is questionable). Education and Children have now moved to Peel Road so that's 51 less for starters http://www.iomtoday.co.im/news/nearly-400-government-parking-spaces-in-douglas-1-2978561 If we assume they're all in and that 50% are essential users then that gives £275 x 166 which is £45650. From this however you'd need to deduct the cost of collection in terms of man hours spent administering this. Each Department would face these costs too. Perhaps this manpower would have been better extended on FOI. This madness could end up costing money.
DOI	Terms	The terms <i>allocated, non-allocated, designated, undesignated and dedicated</i> are used variously in the email and policy document. The email also refers to charging £275 for an <i>allocated</i> space. However, Appendix B refers to charges for <i>dedicated</i> and <i>non-allocated</i> spaces, and the polciy document document refers to <i>dedicated and allocated</i> spaces. The terms allocated and dedicated have been used as though they have both the same and different meansings (<i>allocated a dedicated spaces</i>).
DOI	Management of spaces	Is a designated spaces effectively reserved for one specific users, and an allcoated space intended to allwo parking in any vacant space? How are the two different types of spaces assigned? Does the applicant express a preference, or does the Accounting Office decide? The policy states 'Each member of staff allocated a dedicated car park space is responsible for ensuring that every effort is made to avoid leavign it unused. All staff must co-operate in ensuring that the use of allocated spaces is maximised'. There is inconsistency implicit in the allocation of spaces to staff who will be out of the office regularly due to work commitments and a requirement to ensure that the sapces is fully utilised - the car can't be in two places at once and by definition a member of staff who is frequently out of the office on business will leave a vacant space. This needs clarificaiton. If the idea is to have all spaces used all day then allocate them to staff that never leave the office.
DOI	Cost Benefit	Will the cost of mananaging/adminstering/enforcing the polci to ensure the ost efficient utilisation become overly expensive? A person who is not assigned a space may choose not to bring their own transport to work, which means fewer vehciles available to carry out work. These currently have limited availability, so they would be even more oversubscribed. Some persons are reluctant to use pool behicels because they are unsuited to their personal physical requirements, so they may be unable to carry out their work. Some persons carry significant amounts of tools and equipment in their vehicles in order to carry out thier functions. Regularly transferring these between a base and a vehicles would decerase the amount ofo time available to carry out the primary task.

GOA/Prospect	Consistency across Departments	It would be useful to understand what the psotion is if an area of Government deviates from the policy - are all areas of Government going to adhere to it?
GOA/Prospect	Fees	Whilst we do not believe that the levyign of ANY charge at this time is justifiable, we believe that charnging for ALL employees irrespective of income level is even more unfair and is disproportionate in impact. Fro that reason we seek as a minimum for charges to be levied according to income, and any charges to recognise the current lengthy period of wage restraint which public sector workers are experiencing. It is unclear from this consultation what charges will be - and for that reason alone extremely difficult to take a view on what is proposed and what the impact will be. On phoning to seek clarification the charges are £220 for unallocated spaces, and £275 for allocated spaces. This roughly equates to $\pounds 1$ per day and $\pounds 1.25$ respectively. Whilst this may seem relatively 'cheap' that is a pay cut which will disproportionately impact those on lower incomes.
GOA/Prospect	General	Disability and mobility should be a priority concern when allocating spaces - and the policy should be updated to reflect that. We would seek the policy make it clear that ALL grades may request a car parking space and that seniority of grade will not be permissable as a means of allocating spaces, under any circumstances.
DOI	Fairness	The consultation states agency/contract staff are exempt (why?) when some who fall into this category will be working a period which equates to a permanent person having to pay a reduced parking fee owing to using their own vehicle for some of the time they use it for business travel. Fairness in the workplace?
Personal	General	 the email extract provided identifies it as being "The proposals have been drawn up in conjunction with the Department of Infrastructure as part of a package of measures aimed at meeting its budget target." The Policy Document however, identifies in Para 3 – Objectives that actually make no reference to any budget concerns or requirements, and is trying to hide that overriding factor in the script about what is fair to the Public or encouraging use of alternatives. It should at least be open and transparent. In conclusion for the items listed throughout the Draft, this is a knee jerk proposal, that has been ill thought out as have most of the other DOI directives for them and their own budget concerns, this is an easy option that in fact puts NO onus on them as department to up their game and balance the budget , how good that wpuld be for the rest of us . If the DOI want to charge its staff for parking then so be it , but it should not apply across IOMG , we are doing our savings and budget balance by leaner working practices, and top heavy load shedding. IOMG has to be operated as a business, that is without any doubt, the IOM Population are the shareholders, but ALL shareholders need the company running effectively , and to attaract the right calibre of person .

Personal	Applicability	Inconsistent application : Surely if the perception is , why are we paying for staff , then any provided parking is subject to exactly the same measures, being located in Douglas is a far more reaching higher GOV decision. • The IOMG now chooses to have our department based in the centre of Douglas, we were moved from Hamilton House where parking was made available, free of Charge, to ST Georges Court , where due to 0.5 of a mile difference it was necessary to obtain paid parking. (under the current draft , this will still continue to be free for all the Board of Ed staff) • Surely if parking is provided , at any IOMG actual office location then this should be the same as any other department located around the Island. Example would be, the building I am located in , has underground parking included as the lease provision, this parking should be allocated by the DED to those who are at a comparative Level of Industry where Parking would also be paid for , and then based upon actual Job Role within the department. This is no different than DEFFA , located in ST JOHNS, where parking spaces are available in its own location. What should not be able to occur is purchased off site located parking being paid for by the public purse. However, from the provided map (Very poor in clarity) it would appear that , the Customs and Excise building allocated parking would not be included in this charge This is a non application standard , considering that 200 meters further along is an actual public paid car park facility. If this policy is introduced it should encompass not only Customs House parking , but the whole of IOMG
DHSC	Definitions	With regard to the parking consultation, could you please give some clarity to the following: "The policy recommends that there be no charge for essential users, the disabled and others such as volunteers and staff who work unsocial hours. It is also proposed that there be some discounts depending on the frequency of business usage" Ambulance staff obviously work unsocial hours as defined in MPTC. I take it that my staff parking at Douglas ambulance station would therefore be deemed as exempt? This query has been rightly raised by one of our union reps
DHSC	Definitions	Are social workers considered to be essential car users? As we have to purchase and run a car as part of our employment contract. Will the employment contract be used to decide who is essential rather than the space being given due to being a manager or a high civil service grade. We use our cars to go to see and at times transport our clients. In regard to parking in areas where the public may be charged how will this work when again when we are visiting clients There is also a shortage of car parking spaces in our office as many of the spaces are allocated to office based managers.
DOI	Definitions	Finally, when I commenced employment with the Department my person specification specified that it was essential that I should hold a full driving license and have my own transport. Some of my tasks involve me have to collect order books and receipt books from St Andrew's House on a fairly regular basis for the whole of the Department of Infrastructure. I am also expected if required to

DOI	Applicability	Politicians place of work, I understand, is the Legislative Buildings and assume will have to pay for a permit if they choose to use their own vehicle to attend it and not be treated as a visitor.
DEFA	Fairness	 Fairness, proportionality and equitability The proposed charging pro-rata for staff working less than 0.5 fte could be extended up to 1.0 FTE. The administrative impact could be lessened by using banding. The exemptions (appendix B 4) could be extended to include out of hours workers
DEFA	Fairness	In the interests of fairness and defensibility, it is suggested that consideration be given to extending the Policy to all locations where those key criteria apply (the limited availability of parking for staff and the lack of fairness in providing free car parking for staff in areas where the public may be charged to park in order to access public services).
DEFA	Cost Benefit	In its present form the draft Policy imposes additional administrative burdens on Departments/Bodies which are challenging to the needs to minimise staffing levels and maximise staff efficiency:
DEFA	Management of spaces	 Each member of staff allocated a dedicated car park space is responsible for ensuring that every effort is made to avoid leaving it unused - consider removing this requirement. (It may also tend to discourage use of alternative transport on any days when a car is not needed for business travel). When a member of staff with an allocated car parking space is absent from the office all day, for whatever reason, the space will be re-allocated for the duration of the absence - consider removing this requirement Balancing fairness against the burden of a simplified charging structure becomes more challenging as charges increase.
PSPA	Applicability	The documents states that charges will be made to Departments, Boards and Offices who will then be "responsible for recouping the costs from members of staff": I take it that this does not mean that recouping is optional by the Department or Board and that it must seek to recover the cost where business use for a member of staff is not deemed to be on a daily basis?
PSA	Cost Benefit	I wonder who will administer the system and recouping of costs, given that the policy allows parking spaces to be reallocated for long term absentees, maternity leave etc and there will be some ad hoc bookable spaces? The policy is in danger of becoming unwieldy and overly expensive to administer, particularly for the bigger Departments where there may well be regular changes required for long term absentees etc. Thus the cost of administration could outweigh any savings quite easily. 3. Who will meet the costs of spaces which are designated as only bookable on a specific day for a business need that day i.e. the member of staff only when used (costly to administer), the Department for retaining a free space which is only used on an ad hoc basis (how will they then recharge for the space) etc?
PSPA	Consistency	Who will assess whether the space is used by the individual for daily, weekly etc business use? If the Accounting Officer, will his decision be final or subject to audit/question further up the line? Will this not enable Accounting Officers to just designate that all
	across	

PSPA	Management of spaces	If a Board or Department wishes to give up all of its allocated car parking spaces, will it receive a discount on its rent, assuming that the spaces are below its building and therefore can only be allocated to people working in that building? 8. What is to stop a Department giving up all of its spaces below a building and then because that building is not fully occupied, staff just use one of the "free spaces" on a first come first served basis? 9. What is to stop staff giving up their space and then charging car parking fees on expenses if they need to bring their car in for a meeting outside of the office? Will this not defeat the object of raising revenue and saving costs? Are you not in danger of "encouraging" staff to arrange external meetings so that they can bring in their car and charge for parking all day? Sometimes my staff will not use their space for business use at all, but when we go out to consultation on specific pieces of work they may then be out every day for a period doing presentations, 1-1-1 sessions, meetings etc. How would this be assessable as "average business use"? Will there be guidance on this or is it entirely at the discretion of the Accounting Officer?
DHSC	Definitions	I have fears that this system is open to abuse if department's heads decide who is an essential car use. In social care all social workers use their car on a daily basis but there are not enough car parking spaces hence many workers have to park in the currently free 2 hour parking spaces on the local streets in the surrounding areas. Managers are given an allocated space. Given that we have expanded in managers car parking spaces have been found for them. Many of these managers are office based. The fear I have is that they will just regrade themselves as essential car users. For essential use I would like to see your department set a qualification for essential status based upon a minimum amount of annual mileage being used. This is easily checked by the mileage claims managers and workers submit.
DHSC	Exclusions	Can you clarify wher the car parking consultaiton extends to as the policy states 'Central dogulas disc zones' in one place and 'car parkign spaces in central Douglas' in another. Can you clarify if this policy affects the following car parks: Crookall House, Balldermeen Road (back of old Noble's), Surroundign car parking spaces at Cetnral Community Health Centre, Old Nurses Home on Westmoreland Road. If it does include these areas, then i would liek to register my objections for the following reasons: This proposal is aimed at primarily recoupign financial gain to the department, however it is ultimately a pay cut to my members who are within the DHSC. These same members have not been awarded a percentage pay rise since 2009.
DHSC	Travel alternatives	Staf who provide services within locations for exmaple, at Central Community Health Centre, if this proposal goes through may in turn use public transport to attend and return from work as peron of the objectives within the consultation. Staff often work beyond their contracted hours e.g. if a patient is late or clinic is runnign late and nromally staff continue to deliver patients care, and due to being able to aprk at work enables them some flexibility to do this. If this propos al to charge for parkign isratified and staff choose ot use public transport this flexibility will be lost as staff will ahve to leave as per their contracted hours e.g to catch a bus and this will have a knock on effect of patient care delivery. Bus services to this location in particular were significantly reduced when Noble's Hospital moved to the new site adn whilst is has slightly improved it is by no means a frequent service for some parts of the Island that staff may be travelling to and from. Health and Social care staff frequently work over their contracted hours and the good will from staff will be lost.
DHSC	Indirect discrimination	We feel this policy indirectly discriminates against our predominatly female AHP workforce. A significant proprotion of our members are females with children of school age or younger. They would be unable to use public transport, as the policy suggests, and still get hteir children to shcool/nursery and get to work in time. Several of our members that work in Douglas but live in Ramsey, Peel or Port Erin have looked into this option and the public transport provided by the IOMG is not frequnet or flexible enough to meet their collective needs. They would be forced to use thier cars in effect suffer a pay cut.

DHSC	spaces	if this consultation goes through can the department guarantee there is enough parking spaces available for allocated and unallocated spaces and some of those spaces identified will be made fit for purpose i.e. marked car park lines, adequate lighting and security for these car park spaces? The nature of the work that our members undertake to ensure the highest level of care requires easy access, flexiblity and at times unexpected changes in their work schedule and for the reasons stated above, hence I would like to register my objection this draft consultation on behalf of our Professional bodies.
General Registry		As only a proportion of civil ervants currently have the benefit of aparking space free of charge this in effect constitutes yet a further pay decrease effecting only that particular group of civil servants. When considered together with the lack of
General Registry	alternatives	It is inappropriate to require the attendance of people at meetings/courses away from their usual place of work and facilitate such by providing a parking space and then charge for use of the space. Aggrieved staff who are unwilling/unable to meet the cost of a parkign space may refuse to drive themselves to such meetings. Departments could end up being required to pay for taxis to enable people to attend meetings.
General Registry		Whilst it is intended that such a policy will increase government revenue, the implementation and management of such a policy is likely to cause a significant amount of administration for Departments. The consideration of appplciaitons, allocation of spaces and dealign with requests for refunds will undoubtedly prove time consuming. Any financial gain to government must therefore be offset against the cost of administering such a scheme.
Treasury		Priority should be given - without charge - to those staff who are required to use their own vehicle in order ot carry out their normal day to day tasks. This will include anyone who is required to travel between locations during the working day or those person required to work away from their normal office for limited amounts of time, in other words, where their normal parking arrangements cannot be utilised. Following the above , priority should then be provided to those persons in possession of a disabled parking permit. any charge levied for these spaces should be significantly discounted from the full fee, but anominal charge should be levied for the privilege. all other staf f, regardless of grade, should be asked to contribute to the cost of the parking space, perhaps not at the commercial rate for parking spaces but certainly sufficient to cover the associated administration costs and to contirbute to the cetnral coffers (e.g. 50% of the commercial rate)

-	spaces	Spaces should be provided for Members of Tynwald adjacent ot Departments to which they are assigned. Spaces should be allocated in a car park adjacent to Tynwald (e.g. the underground car park beneath the Courthouse) only for those members who either have no Department or whose Department is not within walking distance of Tynwald, e.g DEFA, DHA & possibly DEC. These spaces should be provided free of charge. Any other spaces, for example a member for DOI allocated a free space at the Sea Terminal, should be paid for at the same rate as other Government staff. Where Department members are assigned to more than one Department based in central Douglas, the member should nominate one space as their primary parking space, with the Department 'hosting' the secondary space being able to re-allocate the space on a short-term basis. Given that all Government properties, including car parkign, is now under the umbrella of Estates services - all Government (s) adjacent to the parking. It should be utilised on the basis of agreed principles (see above0 prior to any commercial car parks being contracted. Therefore, for example, if someon ewho is based in Markwell House qualifies for a car park space then they should be allocated one elsewhere in central Douglas, for exmaple in the underground car park beneath the Sea Terminal, beforea commercial contract is arranged. As a matter of principle any person provided with a discounted parking space who has acess to more than 1 dedicated space should pay the full rate for any subsequent space. If MHKs/MLCs, for example are provided with a dedicated space in Douglas, unless they recoup the charge applicable for the space.
-	spaces	Non-Government staff, including lay members of committees, Boards, Tribunals and possibly Magistrates should be able to utilise commercial car parking and claim back the charges using the expenses system - assuming that Government spaces have all been allocated. These persons typically only utilise any designated parking a few days per month, as such it would be financiall beneficial for a full time member of staff to pay for the utilisation of the spaces. This would be a contributory fact in setting the rate paid by staff, in that the total paid would need to exceed any likely expenses claim fora part time user.
		 In the interests of fairness, proportionality and equitability, the pro-rata charge rate for part time staff should not be limited to <0.5 fte, instead it is recommended that it be applied in simple 0.1 fte per ½ day (10%) steps. (See paragraph 1.1) In the interests of fairness, proportionality and equitability, and to avoid negating the only 'encouragement' in this policy to travel by alternative means, staff not normally using a car but doing so occasionally such as when travelling by other means is prevented by severe weather, should be charged no more than pro-rata, e.g. in simple 10% steps, but there is a strong argument for a zero charge. (See detail in paragraphs 1.2-1.3 & 2.2)

	Travel alternatives	 2.1. The objective to encourage the use of alternative means of transport to and from work is a noble one, and one that if it bears fruit will have benefits far beyond the issue of saving car park space. It is therefore an objective that should be pursued rigorously – sadly, however, the only way this seems to have been viewed is that if staff are faced with an increased cost of travel by car in the form of a parking charge that will persuade them to travel by alternative means. 2.2. As presently drafted, the lack of reduction in parking charge for persons using a car only occasionally, as highlighted in the above comments on fairness and equitability, negates the financial discouragement to use a car: any use of their car, for example at times of severe weather, would effectively cost the individual the same in parking as using the car daily. This is a strongly supporting reason for amending the present approach along the lines of that described previously. Indeed, if there is a real intent to encourage non-car means of transport whenever practicable, then perhaps for persons using their car for less than, say, one in five journeys to work there should be a zero charge for parking. 2.3. Furthermore, in order to further encourage cycling as one alternative means, all government buildings should have bicycle
		 'parking' facilities including shelter and provision for locking, and, although this is going slightly beyond the car park issue, changing facilities and ideally showers within the building. Similarly for persons walking or travelling by bus which may also involve walking, adequate aired storage space for wet outdoor clothing. 2.4. Car parking charges in relation to people car-sharing have already been mentioned under the topic of fairness and equitability, however it is very pertinent to the concept of car sharing. It is not uncommon to take turns with provision of the car, yet as drafted the policy would incur a full car park charge for each car owner. In the case of car-sharing specifically, an alternative to simply a reduced pro-rata charge for each car would be a car-share space, allowing the drivers to share one space by passing the access card to the driver of the day, the drivers sharing a single full car park charge. To avoid administrative burden this could be left to named members of staff to organise subject to appropriate amendment of the clause in section 5: prohibiting sub-letting. Added encouragement could be by favourable location allocation in a car park, with non car-share spaces located furthest from entrances.
	Applicability	1.4. The primary declared tenet behind the Policy is that there is insufficient space for parking, and that as a consequence of the limited car parking spaces being filled by staff the public as service users may be charged to park in order to access those services. This situation t is declared to be neither fair nor defensible: that being the case, the same lack of defensibility must apply in all locations where that applies, and the Policy must therefore be extended to any and all locations where this applies. Beyond that fundamental consideration, in the interests of fairness and equality and recognising the objective for parking charges to encourage alternative means of transport, the principle of charging should be universal.
DHA	General	In drafting this letter I have sought the views of senior officers from the various services within the department before preparing this officer level responseofficers have expressed views regarding the policy as a whoe and also its potential application to sites and locations owned and operated by the Department within the 'central Douglas disc zone'.

DHA	Consultation	It was noted the views of officers in the Department was not sought prior to the drafing of this consultation document. It is suggested that if this had been done it would have removed the need for most, if not all, of this consultation response.
DHA	Fees	Officers obesrvied the policy seem to propose tha the DHA pays a charge to the DOI for all of its parking spaces, with the Department then responsible for recouping these costs via charges to its staff. Officers have raised several queries and observations with regard to this point. 1. Where does the DOI obtain the vires for chargin the Department for parking spaces that are neither owned nor maintained by the DOI? 2. Why should the DOI be able to benefit from charges dervied from property owned/rented/leased and maintained by the Department? If a policy is to be made that charges should be imposed for parking spaces, should nto the revenue derived from this policy to to the part of Government that owns/leases or maintains the parking spaces in question, particularly given the administration burden imposed by the proposed policy? 3. Why should the Department bear the administration burden of allocating spaces, charging staff and enforcing this policy when the Department dervies no revenue or benefit from these charges? Given the large numbers of staff in the Department why should the Department pay the DOI for these spaces? 5. Noting the relatively few staff are likely to pay these charges, and taking account fo the number of parking spaces owned by the Department within the 'central Douglas disc zone', the level of charges proposed to be paidwould be of significant detriment to the Department's finances. This is of particular concern for future budgets as the proposed charges at this time are substantially lower than those charge in the private sector and future increases would obviously have a greater imipact on the Department's finances.
DHA	Applicability	It was noted the proposed area of application of these charges in unclear and ill-defined, with the map provided failing to clearly set out the 'central Douglas disc zone' It seems, given the pressures on parking in Douglas as a whole, this zone could soon be further extended. It is suggested further consideration is given to the area this policy applies to, taking particular account of the requirement for staff to move efficiently around Government to undertake Government business.
DHA	Definitions	It is noted that the definition of essential users and non-essential staff, lackes clarity and would on the face of it, encompass a majority of the staff working for the Department. E.g policy officers work unsocial hours; IOMFRS officers will typically be on call to attend fires; and Probation officers will need to have useof thier vehicles to visit clients. The policy as proposed will therefore likely impact on only a small number of the Department's staff, who may wll wish to to strongly press their own cases for being defined as an essential user given the tasks and duties the Department wishes them to undertake. It is therefore anticipated this definition as presently drafted will cause substantial staff dissatisfaction and incur a cost to the Department in managing this issue.

DHA	Management of	The Department owns/leases/rents the following properties within the "central Douglas disc zone".
אווש	spaces	a. Homefield, 88 Woodbourne Road, Douglas (Chief Executive's Office, Isle of Man Fire and Rescue Service, Civil Defence and Police
		training); La Financial Crime Unit, 2nd Fleen, Finate Will Hause, Budle Beard, Daugless
		b. Financial Crime Unit, 3rd Floor, Finch Hill House, Bucks Road, Douglas;
		c. Probation Services, Prospect House, 27 – 29 Prospect Hill, Douglas;
		d. Police Central Alcohol Unit, Murray House, Mount Havelock, Douglas; and e. Lower Douglas Police Station, Lord Street, Douglas.
		Of these sites, those listed from (b) to (e) have very limited (if any) parking that is not already allocated to essential users given the
		needs of the office and security requirements. The introduction of this policy will therefore not create any more available parking
		spaces for the public, nor generate any revenue for the Department.
		The only site with substantial parking available is the Homefield site listed at (a) above and it is at this site where the impact of the proposed policy is most likely to be felt.
		Homefield is located over a mile away from central Government offices (approximately 25 minutes walking time), making access to a vehicle necessary for timely attendance of most meetings, especially when the weather is poor.
		The site contains more than 30 parking spaces, allocated and unallocated, which to date have proved sufficient for those members of staff who drive to work, the Department's fleet vehicles parked on site and any person visiting the site. When account is taken of the impact of this policy in terms of essential users and those staff members who would no longer drive into work, it is anticipated that only 3 members of staff (out of 40 working on site) would be likely to incur any charge. These members of staff are, as a consequence, likely to charge the Department for mileage incurred to attends meetings that is presently incurred. It is therefore anticipated this policy would incur, when set against the "income" generated from the staff parking charge", a net cost to the Department.
DHA	Consultation	the majority of policy objectives identified in this document would not be achieved when applied to the Department; • for the objective that may be achieved (e.g. more staff walking, taking public transport or car-sharing) this is likely to have a negative impact on the Department's efficiency and effectiveness;
		• the policy will not create a significant number of new parking spaces for use by members of the public if applied;
		• the policy will incur a significant and undesirable cost to the Department given the charges imposed by DoI, the large number of
		parking spaces held by the Department, the small number of non-essential users who may wish to use those spaces and the
		administration burden imposed.
		Conclusion
		It is the view of officers the DoI has, given the queries and concerns noted above, failed to adequately take into account how this policy will impact on the work of Government as a whole. It is suggested that the DoI liaise with all affected areas of Government to develop and refine the policy further before looking to impose any charges.

DHSC	Fees	I just have a couple of points on the car parking survey. Firstly, I work just a few hours a week at Family Planning department. Two of these shifts are in the evening and one is a two and a half hour shift in the middle of the day on a Friday and occasionally on a Monday if I cover for sickness and holidays. I just wonder what the situation would with me with doing some evening clinics but just one clinic in the day. Also is there a provision for someone just doing the odd hours because obviously with the small amount earned with, for instance, 2.5 hours on a Monday on an AA salary grade, it would be difficult to think of paying parking fees.1.2. Some people already use alternative transport to work, such as bus, bicycle or foot, but occasionally travel by car. E.g. staff living within reasonable cycling distance may (and some do) travel by bike under normal circumstances, however it is neither practicable nor safe to cycle in extreme weather, so even an ardent cyclist may leave the bicycle at home and travel by car, especially if not on a practical bus route. Similar limitations can apply to walking, especially if a long distance, while travelling by bus may for example need on occasion to vary start or finish time and so not fit in with bus timings. Similarly some people operate a 'car share' or similar scheme, only using their car a (usually fixed) proportion of days.
	General	In conclusion for the items listed throughout the Draft, this is a knee jerk proposal, that has been ill thought out as have most of the other DOI directives for them and their own budget concerns, this is an easy option that in fact puts NO onus on them as department to up their game and balance the budget , how good that wpuld be for the rest of us . If the DOI want to charge its staff for parking then so be it , but it should not apply across IOMG , we are doing our savings and budget balance by leaner working practices, and top heavy load shedding.
Deemster	Consultation	There is significant doubt as to whether the draft document which is attached entitled 'Allocation and charging for Government car parking in Central Douglas' represents 'consultation' in the proper legal sense of the word. Adequate reasons for proposals must be given so that those consulted may give an intelligent response. Furthermore, the requirement to consult is not satisfied it is treated as a mere opportunity to make ineffective representations. If this, as it appears to be, is simply a budget-driven exercise, the decision to levy charges has clearly already been made, and nothing which I or others may say can have any effect on that decision. it is clear that these proposals are not (as with a properly constituted consultation) at a fomative stage and any purported consultation is meaningless.
Deemster	Cost Benefit	On emight of course comment that to impose car park charges of this nature will have such aminimal effect on Government's overall fincial position as to be de minimis and pointless. No information is givne in the consultation document as to the how the charnges adn the ineveitable additional bureacracy accompanying it will impact on the DOI's budget or more significantly, how it at all it will affect the overall budget of the IOMG. There is no discussion of the many alternatives to deal with the alleged budget shortfall. It is therefore impossible meaningfully to respond to the (presumably financial) rationale behind the proposal.

Deemster	General	I am particularly concerned about the imposition of a charge to park my vehicle in the Courts of Justice car park which is an underground basement care park which is an integral part of the building in which I work. This is not a building ot which the public have access in order to park their vehicles. One of the reasons given in the covering email for the policy's introduction is that 'provision of free car parking for public servants in areas where the public may be charged is neither fair nor defensible'. Teh car park under the Isle of Man Courts of Justice building is self-evidently not one 'where the public may be charged'. It is part and parcel of my principal place of work. Logically, there is nothing to prevent the successful imposition of charges for parking from creating a precedent for the imposition of charges for a variety of facilities integral to the building, for example, heating, stationery, telephone, computer facilities or electricity to make a beverage. Whilst these might seem ridiculous examples, I can assure you that I had been told in 2007, before I was appointed to judicial office, that judges would be charged for parking their cars int eh court building, I would have regarded that as an equally absurd idea. Furthermore, I would be astonished if the judiciary in any other comparable inviation.
Deemster	Definitions	This leads me on to perhaps the most significant issues, which is the nature of the judicial role. Members of the judiciary in the Isle of Man do not work a 9 to 5 day. Evening and weekend work is a regular part of our lives. This requires 24 hours access to the court building and the need for a vehicle in order ot transport large amounts of written, often confidential, material securely to and from home, where we are frequently require to work out of normal office hours. It is ludicrous to suggests that a member of the judiciary could car share or use public transport, the encouragement of which I repeat appears (oddly) to be on the objectives of the policy. In the covering email of 15th Januaryfrom Mrs Leece's reference is made to a recommendation that 'there be no charge for essential users' and others 'who work unsocial hours'. It seems to me that the judiciary (and their clerks) fall squarely within this category.
Deemster	Fees	I would also point out that the deduction of car park charges from the salaries of those affected is likley to be an unlawful deduction for the purposes of section 21 of the Employment Act 2006. Furthermore, section 57A of the High Court Act 1991 provides that the salary of a judge of the High Court may 'not be reduced'. The imposition of such a charge would constitute such a reduction. I am very conscious that the imposition of £275 per annum in order (allegedly) to help the DOI balance its budget may not be felt to be a matter to which a member of the judiciary is entitled or ought properly, to object. Nevertheless, in the context of other proposed attacks on juidicial remuneration (in particular proposals to alter the judiciary to carry out its functions. It provides the DOI and possibly departments with a future template for use in the imposition of further chrages for facilities which are esenntial in order to enable the judiciary and thier support staff to do their jobs. In other words, it is in essence a stealth tax on employment. It represents yet another (admittedly small but significant for the reasons set out above) pay cut for those who administer justice and who have seen their pay and conditions steadily reduced in real terms over the last few years. This proposed policy and the consultation thereon are illogical and unlawful and should be abandoned.
DHSC	General	Adult Services recognise the need for the Isle of Man Government to generate additional revenue and also to address the issue of the allocation of parking spaces to Government employees and therefore we are not opposed to the principle of addressing these two issues. Equally, it will be the decision of the accounting officer as to how the proposed charges are levied, as it is the Department of Infrastructure who will charge the individual Departments

DHSC	Fairness	The proposed system is inequitable as it discriminates against those employees based in Douglas. There is no policy to charge for those based outside Douglas which will immediately create inequality and will serve only to be divisive. 2) The allocation of spaces and payment will be delegated to individual Departments. This will allow the Departments to be discretionary in whether they pass on the charges to individual staff. 3) Why only Douglas? The highest salaries are paid to many employees outside Douglas for example Medics / Consultants who will not be expected to pay. This is of particular concern as some of the work undertaken whilst using Government car parking spaces is for private work.	
DHSC	Applicability	The policy recommends that there be no charge for the disabled and staff who work unsocial hours but it doesn't specify why? These staff gain financial benefit from working. 5) By not charging for parking in bases outwith the Douglas Disc Zone the Government raises the potential for Nobles Hospital to be used as a park & ride. This would only exaggerate the issues in Nobles car park already. It is the view of Adult Services that this is a rather clumsy way of raising income and could	
General Registry	Management of spaces	Further if you choose not to purchase a space and use the spaces of others due to absences would this be fair on those who have paid? Could this not be manipulated?	
Policy			
Treasury	1. Intro	I do not agree that it is indefensible for some Govt staff to receive free parking. I would argue that as many employers provide free car parking for their staff it is no different when the Govt, as an employer, provides free parking for some of its staff.	

1. Intro	. INTRODUCTION Isle of Man Government recognises that many public sector employees are required to use their own transport to travel to work. However, most Departments, Boards and Offices are only able to provide limited car parking for staff. Statement of fact – but applicable to all walks of business, both private and public
	At the same time, it is recognized that provision of free car parking for staff in areas where the public may be charged to park in order to access public services, is neither fair nor defensible. The Department of Infrastructure has determined that a charge will be made to individual Departments, Boards and Offices in the central Douglas disc zone area for the provision of parking spaces at their premises. Accounting Officers will therefore be responsible for applying cross-charges to staff as appropriate, in accordance with the criteria outlined in this policy. WHY? the majority of business, retail, Legal, accounting, and CSPs etc provide staff parking but no client parking. Other than large shopping markets, most do NOT provide parking for their customers, they have to pay or find a non paying park space (time limited), why should IOMG be any different.
	 Having moved from the Private sector at the same seniority level in various companies, I can state that in each case Car Parking (amongst other Non Contractual T&Cs, health care, travel discount etc) was provided at no cost to myself. Car Park provision or allowance is a recognised comparative industry standard benefit .
	Where parking spaces are provided, the Isle of Man Government is committed to ensuring that there is a fair process of allocation and charging for staff to use available parking spaces. This does require an IOMG defined policy , about allocating park spaces. This policy applies across all areas of the Isle of Man Public Service. Obviously NOT all areas of Public Service, only to those based in Douglas , how is that fair .
	6) On the introduction of the consultation document page 2 paragraph 2 it says " it is recognised that provision of free car parking for staff in areas where they public may be charged to park in order to access public services is neither fair nor defensible", some departments may be in the disc zone but no charge is made for the public to access the building surely then no one parking should be charged.
	If this is going to happen then is should be across the whole of the Public Sector and Government i.e. Nobles, Ramsey Cottage Hospital, Prison etc

MUA	1. Intro	I do not agree with the statement that "provision of free car parking for public servants in areas where the public may be charged, is neither fair nor defensible" If an employer (Government) owns a piece of land to park employees' cars on they can allow their employees to park there for free. I do not have a problem with that. If Government cannot afford to give pay rises the least they can do is to allow free parking. If this scheme did involve me I would see it as just another kick in the teeth. So often we hear that "our employees are our main asset", it is time that this is was proven rather than some hollow statement.
		If value must be placed on the car parking space please look at it as remuneration for staff rather than income for the Government
Personal	1. Intro	 WHY ? the majority of business, retail, Legal, accounting, and CSPs etc provide staff parking but no client parking. Other than large shopping markets, most do NOT provide parking for their customers, they have to pay or find a non paying park space (time limited), why should IOMG be any different. Having moved from the Private sector at the same seniority level in various companies, I can state that in each case Car
DOI	1. Intro	The policy is limited to spaces within the central Douglas Disc Zone, on the basis that those residents were going to be charged for their parking permits. Since thi si now not the case (Tynwald 20 Jan 2015), and the Tynwald motion stated "Charging for residents parking permits should not be intoduced until Tynwald has had the opportunity to consider fully teh positive and engative aspects of such a charge", ther is no basis for introducing the charge or limiting it to the area proposed.
DHSC	1. Intro	 page 2 paragraph 2 it says " it is recognised that provision of free car parking for staff in areas where they public may be charged to park in order to access public services is neither fair nor defensible", some departments may be in the disc zone but no charge is made for the public to access the building surely then no one parking should be charged. 10) Ref the comment that "provision of free car parking for staff in areas where the public may be charged to park in order to access public services, is neither fair nor defensible". We are not aware on any government buildings where this applies. If there is such a case the public would presumably be there less than a couple of hours and so have the choice to utilise free disk parking where available and not incur charges. Staff do not have that option as they cannot leave every two hours to move their cars.

DOI	1. Intro	The introduction on page 2 states:
		"free parking for staff in areas where the public may be charged to park in order to access public services, is neither fair nor defensible."
		It is a matter of fact that the public are not charged for parking at the majority of Government buildings in Douglas and there is no intention to charge them. For example, parking at the Sea Terminal is free for members of the public who have business at the Sea Terminal. An exception to this is the Airport and yet this falls outside the area where you are seeking to charge staff. In addition, on street parking for residents and the public on the public highway remains free for the public in the Douglas disc zone. This free parking for residents is not subject to any administration/enforcement costs, any restriction on the number of vehicles residents can park or any restrictions on the duration they can park. The only requirement is that the resident owns the vehicle and lives at an address in the Douglas disc zone.
		It is clear the evidence does not support this statement.
		The introduction on page 2 states:
		"The Department of Infrastructure has determined that a charge will be made to individual Departments, Boards and Offices in the central Douglas disc zone for the provision of parking spaces at their premises."
		This statement indicates the decision has already been made. No engagement has taken place with staff on this matter and you appear to be asking staff to have their say after this issue has been determined. In addition, it appears the Department of Infrastructure is the only Department to have made this determination which increases the likelihood of individual staff working for this Department in Douglas being asked to pay for their parking from their salaries.
DHSC	1. Intro	Introduction: Part of the rationale behind this is that it is not fair that the public have to pay for a space where we don't – where in DHSC do the public have to pay except if they are visiting Markwell House (when it is easier but not essential) to park in the pay & display car park?
		Why only include Douglas? There is more pressure for car park space generally but it penalises those who have to work in Douglas. There have been occaisions in the past where finding a space at Ramsey Cottage Hospital is very difficult Some staff work from different areas, so they may work from a Douglas base for several weeks, and need their car for work duties, then move to Peel for example to do the same role. How will they be charged / allocated?
DOI		I find the consultation paper rather disconcerting when it states in the second paragraph it is recognised that the provision of free car parking for staff in areas where the public may be charged to park in order to access public services, is neither fair or defensible

Prospect/GOA	2. Aim	The aim of the new document to provide clarity in this area is welcomed. We would seek that the policy is applied equally to all- not just recommended for some parts of Government as cited in the document.
Treasury	2. Aim	 Working through the document; 2. Aim The proposal says "It is recommended that this policy is also applied to all Members of Tynwald, Members of staff within the Clerk of Tynwald's Office and Members of the Judiciary and other Crown appointments". I note the use of the word "recommended". This should be a level playing field for all. Either everyone pays from 1 April or nobody does.
DHSC	2. Aim	Aim: "it is recommended that this policy applies to members of Tynwald" etc – if this goes ahead it should be for ALL government staff
DHA	2. Aim	Firstly, it is unclear what the aim of these proposed charges is. Is it to raise revenue or is it to appease those that work in the private sector who pay for parking and seek parity with themselves?
DHSC	2. Aim	The consultation is not fair and discriminator in that it appears to be targeting staff who work in and around the Central Douglas area. Staff throughout DHSC are being treated disproportionately. Whilst our departmental base is within central Douglas, staff provide services througout the Isle of Man. Some staff may be delivering services more outside the central Douglas area e.g. Ramsey, Port Erin even though their base is in Douglas. which by the nature of the proposal is unfair and discrminatory to those staff who may need to pay for the allocated/unallocated parking. This appears to go agianst the main principle of the government aim. It is also discrminatory as health care staff who may have to attend meetings (quite offten at Noble's Hospital), deliver training adn be able to attend professional development sessions at Keyll Darree, whic if they are beign forced to pay for car parking and choose to use public transport or walk to and from work will not be able to fulfil these commitments.

AIM
The main aim of this policy is to ensure that the provision of car parking for public servants who are based in locations within central
Douglas disc zones is fair, proportionate and cost effective.
WHY ONLY DOUGLAS ?
This policy applies to all relevant public servants and employees within Government. It is recommended that this policy is also applied to all Members of Tynwald, Members of staff within the Clerk of Tynwald's Office and Members of the Judiciary and other Crown
appointments.
Inconsistent application :
Surely if the perception is , why are we paying for staff , then any provided parking is subject to exactly the same measures, being located in Douglas is a far more reaching higher GOV decision.
• The IOMG now chooses to have our department based in the centre of Douglas, we were moved from Hamilton House where
parking was made available, free of Charge, to ST Georges Court, where due to 0.5 of a mile difference it was necessary to obtain
paid parking. (under the current draft, this will still continue to be free for all the Board of Ed staff)
• Surely if parking is provided , at any IOMG actual office location then this should be the same as any other department located around the Island.
Example would be, the building I am located in , has underground parking included as the lease provision, this parking should be allocated by the DED to those who are at a comparative Level of Industry where Parking would also be paid for , and then based upon actual Job Role within the department. This is no different than DEFFA , located in ST JOHNS, where parking spaces are
available in its own location.
What should not be able to occur is purchased off site located parking being paid for by the public purse.
However, from the provided map (Very poor in clarity) it would appear that , the Customs and Excise building allocated parking
would not be included in this charge. This is a non application standard , considering that 200 meters further along is an actual public paid car park facility. If this policy is introduced it should encompass not only Customs House parking , but the whole of IOMG
locations should be required to be accountable.
This is a definitive aspect of inconstancy that should be challenged in the full legal context of staff provided parking.

	2. Aim	The stated primary aims that the policy should be fair and proportionate as well as cost effective are welcomed, as are the declared objectives. As presently drafted, however, the policy does fall short of the aims to be fair and proportionate, and similarly fails to meet the objectives of encouraging the use of alternative means of transport to and from work and applying a fair and equitable scale of charges for staff car parking. The stated primary aims that the policy should be fair and proportionate as well as cost effective are welcomed, as are the declared objectives. As presently drafted, however, the policy does fall short of the aims to be fair and proportionate, and similarly fails to meet the objectives of encouraging the use of alternative means of transport to and from work and applying a fair and equitable scale of charges for staff car parking.
Personal	3. Objectives	OBJECTIVES To encourage the use of alternative means of transport to and from work, including the use of car sharing and public transport The use of car sharing can prove to be very To ensure adequate parking for visitors and members of the public To cope with car parking when demand exceeds supply Who and what is this identifying , Demand will always exceed supply, To provide a fair system for the allocation of staff car parking based on need a policy to create transparent allocated parking is needed, but without a charge element. To apply a fair and equitable scale of charges for staff car parking So because one IOMG department is unable to make its own budget changes the whole of IOMG now has to make it up for them.
	3. Objectives	 To assist meeting the objective of encouraging travel by alternative means to car, facilities for cyclists and walkers should be provided/improved anywhere that they are lacking or inadequate (2.3). In the interests of encouraging travel by means other than car there should be special provision for charging and space allocation for committed car-sharing. (2.4) It is proposed that for car park spaces additional to business users consideration of travel needs is a better means of allocation than on a first-come first-served basis. (3.1)
General Registry	3. Objectives	In many circumstances imposition of the proposed policy would fail to achieve most of the intended obejctives as set out in the draft policy: To encourage the use of alternative menas of transport The proposed policy would not in my view encourage use of alternative means of transport. Due to the need for many people to have a car for various reasons including lunch time and after work commitments, the loss of parking space (or beign required to pay for it and deciding to give up the space) would cause them to park elsewhere rather than struggle ot work around a car sharing arrangement or public transport which could prove impossible. I
General Registry	3. Objectives	To ensure adqequate parking for visits and members of the public . This objective is not applicable in relation to car parks where the visitors and members of the public are not permitted. For example, as stated above for security reasons it would be tootally inappropriate for members of teh public to have access to the car park underneath the Courts of Justice building. Therefoe charging or removal of such spaces would be of no benefit to visitors or members of the public

General Registry	3. Objectives	To cope with car parking when demand exceeds supply . Again this objective is not aplicable in relation to restricted car parks such as the one under the Courts of Justice building. For securit reasons such parking spaces should not be made avialable to the general public. As mentioned above my view is that remova or charging for such spaces would only servce to increase the demand for disc zone spaces in the vicinity of the Courts of Justice Building.
General Registry	3. Objectives	To provide a fair system for the allocation of staff car parking based on need. Some departments already have a policy for the allocation of parking spaces. Whether or not a charge is made for the spaces has not impact whatsoever upon whether they are being allocated fairly. Indeed, charging could in fact result in unfairness in the allocation of staff car parking as staff with a genuine requirement for a parking space who would ordinarily have been allocated one may not be able to afford the cost and be force to give up such space.
General Registry	3. Objectives	To apply a fair and equitable scale of charges for staff car parking . Whilst fiarness is always a commendable objective there are not enough spaces available for all staff therefore total fairness in relation to car parking is simply not possible. AS mentioned above the charging for spaces in itself is unfair to the individuals affected as it constitutes a further deterioation in conditions of service (ranging from significant changes such as increased pension contributions to relatively minor changes such as the loss of time off at Christmas) is having a significant on the morale and motivation of staff. A further deduction from wages in relation to parking fees will only serve to furtherd demotivate staff. Rather than employing staff who feel valued and take a pride in their work Government may soon start to lose the goodwill of staff.
DHA	3. Objectives	Encourage alternative means of transport - A significant number of affected staff members will use alternative forms of transport to the office. However, this would be of detriment to the operational effectiveness fo the Department if staff actually did so. The staff members in question would not longer have available thier own vehicles to perform tasks such as attending meetings, visiting clients or delivering documents. Consequently, the efficiency and effectivness of the Department as a whole could be reduced, makign this objective, in the view of officers, undesirable. Furthermore, for those who have indicated they would pay for parking, it has been made clear this will result in increased claims for mileage that will likely cost the Department more than it recoups form the parking charges. To ensure adequate parking for visitors and members of the public. Officers have noted, of the locations operated by the Department, only one has the facility to offer parking spaces to the members of the public visiting the site (Homefield). As a consequence of this policy there would be no significant improvements in parking for visitors and members of the public. to cope with car parking when demand exceeds supply . In the affected sites, supply either typically exceeds demand imposed by staff and visitors (Homefield); is so limited as to already be effectively controlled (e.g. Prospect House) or is controlled by essential user and security requirements (Lord Street Police Station). As a consequence, the introduction of this policy will not serve to better 'cope' with car parking demand at Department owned sites. To provide a fair system for the allocation of staff car parking based on need . Officers are satisifed that, in the affected sites the allocation of car parking spaces is already fairly allocated on the basis of need. To apply a fair and equitable scale of charges for car parkingh . In the charges section officers have already expressed concerns about the charges proposed.

	3. Objectives	 OBJECTIVES To encourage the use of alternative means of transport to and from work, including the use of car sharing and public transport The use of car sharing can prove to be very To ensure adequate parking for visitors and members of the public To cope with car parking when demand exceeds supply Who and what is this identifying , Demand will always exceed supply, To provide a fair system for the allocation of staff car parking based on need a policy to create transparent allocated parking is needed, but without a charge element. To apply a fair and equitable scale of charges for staff car parking So because one IOMG department is unable to make its own budget changes the whole of IOMG now has to make it up for them.
Deemster	3. Objectives	It is entirely unclear what the true objective of the proposed policy is. On the one hand reference is made a paragraph 3 to objectives, for example encouraging the use of alternative means of transport to and from work, ensuring adequneat eparking for members of the public and to rpovide a fiar system for the allocaiton fo staff car parking based on need. Yet it is clear form the covering email tha tthe proposals have in fact been drawn wholly and mainly in order to enable the DOI to meet 'its budget target'. In other words, what is essentially an entirely budget-driven exercise is dress up as a 'consultation' dealing with the allocation of car park spaces and various spurious 'objectives' whic are entirely unrelated ot the true object, which is to raise moneh from Government employees and those appointed by teh Crown to remedy the budget deficient of a Government Department. It is therefore quite impossible to give a meaningful response to such a confused and confusing document.
DEFA	3. Objectives	To encourage the use of alternative transport to and from work, including the use of car sharing A reduction in the use of private motor vehicles will be beneficial to the environment through reduced emissions, and the objective is one that DEFA strongly supports. Using alternative methods eg cycling or walking, can also improve health for the individual, which in the long term is likely to be beneficial to Government both through reduced staff sickness absence and reduced burden on the health service. Many people who do use alternative means of transport as much as possible also use a car on occasion due to poor weather. To promote the use of alternative methods of transport the following may help: • A sliding scale of charges for reduced car use, possibly seasonal • Each permit could bear multiple car registrations (perhaps up to three) to stimulate car sharing and reduce traffic To provide a fair system for the allocation of staff car parking based on need • Spaces should be allocated on a strict business need basis – this would include staff retention eg. retention of staff on lowest grades who perhaps live more than 10 miles and have no alternative transport • Any spaces identified as surplus to be relinquished or used for public. • No spaces should be dedicated beyond those for essential users. All other spaces simply require the display of a permit.

Treasury	3. Objectives	 Second bullet point – What about buildings which have secure parking areas (such as under the courthouse)?. The security aspect means that those spaces could never be used by the public. Why charge for these? Fourth bullet point – Really? This has got to be a joke. Who will decide what's "fair"?. Some grades as high as HEO are eligible for social security benefits such as EPA. Income based entitlement would be a better way to allocate parking. There are pay car parks within quick and easy walking distance of most central Douglas government buildings. Allocate the free spaces to those who struggle on low pay. Fifth bullet point – There's that word "fair again". How about a sliding scale of charges based on pay. £275 is .55% of £50k. How about £275 and then .55% of gross for anyone over £50k?
Civil Service	3. Objectives	The policy makes reference to encouraging other means of transport to work. If Government is serious in this respect then it needs to provide proper facilities at work for bicycles so they are secure and also shower/changing facilities for staff. We currently seek to maximise the use of the spaces allocated to us when staff are absent through annual leave or sickness and sometimes when demand due to particular circumstances require a regular space user to free up their space. This is straight forward with the parking at Courts, however I do not understand how this can be implemented for those using spaces in Chester Street where I understand a permit is required. Unless more than one permit for the space is provided how will staff handover the parking permit? The policy document indicates that the charges are being introduced for spaces where the public could be charged, in respect of the spaces used by General Registry under the Courts these spaces could not be utilised by the public due to the security requirements around the courts.
	3. Objectives	 the email extract provided identifies it as being "The proposals have been drawn up in conjunction with the Department of Infrastructure as part of a package of measures aimed at meeting its budget target." The Policy Document however, identifies in Para 3 – Objectives that actually make no reference to any budget concerns or requirements, and is trying to hide that overriding factor in the script about what is fair to the Public or encouraging use of alternatives. It should at least be open and transparent.

DHSC	4. Allocation	Aim: "it is recommended that this policy applies to members of Tynwald" etc – if this goes ahead it should be for ALL government staff Allocation: When prioritising, factors to take into account include "other relevant factors identified by the accounting officer" – like what? How will fairness be assured rather than power / influence? Page 4: "Where there are multiple requests for the same perioddecision based on priority of the business need" – how will the accounting officer decide who's meeting or work is more important? How can someone say that one meeting is more important than the other? How will this be monitored to ensure fairness? Designated spaces for pool cars – is a valid concession, but many services cannot get pool cars although have a great need for them – so the pool car system needs to be made fair in order that this concession is fair
GOA/Prospect	4. Allocation	There is a general caveat for prioritising allocation which reads 'Other relevant factros which are identified by Accounting Officers' this is too vague and allows a get out clause for unfair and inconsistent practice to develop. The reference to 'abuse' of visitor sapces is unnecessary and insulting - we woudl seek this to be removed.
DOI	4. Allocation	Does the phrase 'first come-first service' refer to the receipt of applications or arrival on site?
Personal	4. Allocation	ALLOCATION OF STAFF CAR PARKING SPACES The Accounting Officer will have the responsibility for the allocation of available spaces having regard to this policy, although he/she may delegate the authority to a nominated deputy or other senior officer. Generally, no member of staff has an implied or contractual right to a car parking space, unless it has been expressly included in their Terms and Conditions of service or employment. Several Members of our department actually do have it listed in the Actual contract of employment, this is an inconstant aspect but will give a problem internally . Car parking spaces available for use by members of staff are valuable resources and must be utilised to best effect, having balanced the following factors:
		 Priority in the allocation of car parking will be given to those members of staff whose job requires them to travel on official business during the normal working day Amongst such employees, there may be further factors to take into account when deciding on the priority and these will include: o The frequency of travel required for business related journeys2; Frequency of the need to return to base; Achieving maximum efficiency;

Personal	4. Allocation	 Where appropriate, consideration will be given to staff who are disabled and who hold a Disabled Persons parking permit. Consideration should also be given to staff with medical conditions, where their application is supported by their doctor or Occupational Health and approved by the Office of Human Resources as a necessary workplace adjustment. Each member of staff allocated a dedicated car park space is responsible for ensuring that every effort is made to avoid leaving it unused. All staff must co-operate in ensuring that the use of allocated spaces is maximised. When a member of staff with an allocated car parking space is absent from the office all day, for whatever reason, the space will be re-allocated for the duration of the absence. This will include both short-term absences and longer periods of sickness, maternity or special leave. How can I be asked to pay for a parking space to cover me a full year, and then be expected to give that up just to make sure it is filled. What right does IOMG have to make that statement when my own money will be paid. To be clear as the park is allocated to my position now , when ever it is available , all the other staff utilise it , this is of course totally fair as I have not paid for the space. If I am to pay for the park, the decision to offer it for some other person should be left with my own decision , as it is my money that
DEFA	4. Allocation	 Where there is sufficient capacity at the premises to offer allocated parking to non-essential users, Accounting Officers may allocate further spaces on a first-come/first-served basis. Consider basing allocation of spaces on the difficulty of travel between home and work by alternative means such as public transport. The opportunity could be taken to provide guidance in allocating dedicated car park spaces: To put the customer first - dedicated visitor spaces could be allocated as close as possible to buildings entrances (closer than staff spaces). Where applicable space closest to the appropriate entrance/exit could be designated as a 'loading bay' where staff have to carry equipment to/from vehicles. To help encourage car share, nominated car-share spaces could be located in particularly favourable positions.
FSC	4. Allocation	The commission's staff are not Civil Servants and therefore have terms and conditions separate to those in the civil service. Car parking is not included directly in the staff contracts, however the contract is linked to the Staff Handbook which sets out a car parking policy based on seniority first thereafter length of service. Staff are required to comply fully with all the operational rules relating ot their employment within the Commission's Staff Handbook and therefore this would cause great difficulty to vary the existing policy which provides for a car parking space. The majority fo visitors to the Commission are based in Douglas therfore the provision of on-site visitors spaces has not been deemed necessary. 'Where appropriate consideration will be given to staff who are disabled and who hold a Disabled Persons parking permit' The Commission agrees with this point.

General Registry	4. Allocation	Staff responsible for ensuring spaces not left unused' 'No permission to sub-let' 'No refunds for annual leave'. It is
		already the practicd of saff of some departments who have an allocated parking space to allocate it to someone else whilst they are away from the Office. (e.g leave/training etc) However it is totally unfair that staff should pay for a space that they <u>must</u> let some else use for free periods that they are absent from the office. Whilst one or two days may be considered negligble in reality it is much more than that. If you are paying an annual amount for a space you should be able to receive a deduction of the cost or alternatively a contribution from those using your space in your absence. The spaces should be used by people actually in work, however if you are unable to request a contribution and you are paying for the space you should at least be able to use the space yourself whilst you are off. I note that there is a concession for absences of more than six weeks however without including days out of the office for courses/meetings etc many civil servants combined annual and flexi leave allowances are 50 days per year. It is totally unfair for someone to be required to pay an annual fee for somethign that they must allow someone else to use at no cost for 20% of the time. Whilst it is accepted that the person who is paying for the space has priority over its use it is still unfair that there isnot allowed to be any reduction or sharing of cost.
FSC	4.Allocation	Each member of staffre-allocated for the duration fo the absence ' the use of allocated spaces are maximised already at the Commission. When a staff member with a dedicated space is absent is placed into a 'pot' and other staff can use this on a 'first come-first served' basis.
	4. Allocation	3.1. Section 4 says that where there is sufficient capacity at the premises to offer allocated parking to non-essential users, Accounting Officers may allocate further spaces on a first-come/first-served basis. It is suggested that an alternative interpretation of fairness would be for allocation to be on the basis of difficulty of travel between home and work by alternative means such as public transport, bicycle or on foot.

	4. Allocation	ALLOCATION OF STAFF CAR PARKING SPACES
		The Accounting Officer will have the responsibility for the allocation of available spaces having regard to this policy, although he/she
		may delegate the authority to a nominated deputy or other senior officer.
		Generally, no member of staff has an implied or contractual right to a car parking space, unless it has been expressly included in
		their Terms and Conditions of service or employment.
		Several Members of our department actually do have it listed in the Actual contract of employment, this is an inconstant aspect but
		will give a problem internally . Car parking spaces available for use by members of staff are valuable resources and must be utilised to best effect, having balanced
		the following factors:
		 Priority in the allocation of car parking will be given to those members of staff whose job requires them to travel on official business during the normal working day
		 Amongst such employees, there may be further factors to take into account when deciding on the priority and these will include:
		o The frequency of travel required for business related journeys2 ; o Frequency of the need to return to base;
		o Achieving maximum efficiency;
		o Other relevant factors which are identified by the Accounting Officer.
		Accounting Officers should ensure that there are sufficient spaces available for visitors on official business and that these are not
		abused by being used by staff. Where there is sufficient capacity at the premises to offer allocated parking to non-essential users, Accounting Officers may allocate further spaces on a first-come/first-served basis.
		Our parking spaces are in the basement of the building we occupy, how would any member of the public ever think to usue these
		parks. Addtionally the car park is patrolled by a private security firm as provided by ther lease holder , how would they ever know if parking was a legitiame visitor or the park was being used by anyone .
		The allocation of car park spaces will normally be carried out annually and subject to an application process, taking the above factors
		in to account. A pro-forma application form is attached at Appendix A. The Accounting Officer or their nominated Deputy may re-
		allocate car parking spaces more frequently to ensure allocation reflects current circumstances. It will be for Accounting Officers to determine how the allocation of spaces is administered in practice (e.g. by issuing permits/booking systems etc.)
		• Our department covers a global requirement, with actions being carried out in almost every time zone, and there is an ongoing
		requirement that extended hours cover be necessary. Please note this is NOT a job description or contractual requirement, but is
		given by myself and office collegues due to the factors of car parking being available at no cost .
		• Should this parking charge be made against an allocated park space, I will no longer be ablke to provide that level of flexibility
		as in the interest of my own cost saveining I would now require to use standard public transport.
		Where appropriate, consideration will be given to staff who are disabled and who hold a Disabled Persons parking permit.
DHSC	5. Staff Car	Fees:
	Parking fees	
		"spaces allocated to staff in accordance with the scale of fees outlined in appendix B'' – this scale is not there

GOA/Prospect	5. Staff Car Parking fees	staff should be able to claim a refund for at least 1 week periods of non-use -give the ability to re-assign spaces set out in the preivous sections, and the ban on 'sub-letting' for any period denying the perso the chance to recoup costs.	
OHR	5. Staff Car Parking fees	I would comment on para 5, Staff Car Parking Fees: • Draft policy proposes fees may be deducted from salaries monthly (or annually if preferred), however that staff will still be expected	
FSC	5. Staff Car Parking fees	It is unclear what is meant by "allocated" and "other" space so it is difficult to have any meaningful comment on this.	
Personal	5. Staff Car Parking fees	Departments, Boards and Offices will make a charge for all car parking spaces allocated to staff in accordance with the scale of fees outlined in Appendix B. Fees will normally be deducted from salaries each month in 12 equal instalments normally commencing in April of each year and will be subject to review from time to time. Alternatively, staff may pay the annual charge by cheque made payable to 'Isle of Man Government'. Part C of the application form states that PART C – CAR PARKING CHARGES There is a fee for staff car parking spaces, which depends on your annual basic salary and whether you are full or parttime, discounted based on average usage. Volunteers or staff on zero hours contracts will be exempt from any charge. The current scale of charges are outlined in Appendix B of the Policy for allocation and charging for Car Parking spaces This is in conflict to the statement of cost incurred, why does annual salary have to come in to it. To enable my position has taken considerable personal financial penalty to me over the years for training and time and inconvenience, why should I now be penalised twice . ?	
DOI	5. Staff Car Parking fees	I had assumed that there would have been some scale of fees / charges included as part of the consultation which would have given an indication, based on salary etc, how much the annual charge would be. I have been directed to Appendix B within the consultation document, but this doesn't contain the scale of fees I understood that it would have. Are you able to provide any further information on this please? The discount rates are also not very clear – I work 4 days a week, am I eligible for the discount? Is this classed as intermittent? I had also originally been under the impression that this would apply to Senior Officers only – there is no mention or reference to this within the consultation document. Can you clarify whether this proposed Policy will apply to all Government Officers?	
Treasury	6. Appeals	Section 6 It is not clear whether there is an appeal route open to those who do not agree the % fee they have been charged.	
	Appendix A - Application form		

DHSC		Appendix A part C Why does the fee depend on annual basic salary? And where is the scale of fees?
Treasury		Declaration omits some of the categories listed in the policy
DEFA	Fees	Part C of Appendix A states that the fee 'depends on your annual basic salary'. As yet the stated fees in the consultation note on the website do not have any correlation to salary. This should be clarified.
	Fees	STAFF CAR PARKING FEES Departments, Boards and Offices will make a charge for all car parking spaces allocated to staff in accordance with the scale of fees outlined in Appendix B. Fees will normally be deducted from salaries each month in 12 equal instalments normally commencing in April of each year and will be subject to review from time to time. Alternatively, staff may pay the annual charge by cheque made payable to 'Isle of Man Government'. Part C of the application form states that PART C – CAR PARKING CHARGES There is a fee for staff car parking spaces, which depends on your annual basic salary and whether you are full or parttime, discounted based on average usage. Volunteers or staff on zero hours contracts will be exempt from any charge. The current scale of charges are outlined in Appendix B of the Policy for allocation and charging for Car Parking spaces This is in conflict to the statement of cost incurred, why does annual salary have to come in to it. To enable my position has taken considerable personal financial penalty to me over the years for training and time and inconvenience, why should I now be penalised twice . ?
		Car parking charges - refers to depending on your annual basic salary, can more details be supplied ?
Civil Service		I would make the following comments in respect of the form, Part C suggests that the fee will be based on the level of salary but this is not reflected in the charges and would not in any event appear fair. The form does not provide a section to indicate any application
FSC		There are a number of errors in the document such as the reference to fees being based on annual salary (which it is not) and therefore the form to be completed should not include "Annual Salary".
	Fees	1.1. Appendix B says that charges will be pro-rata for staff less than 0.5 fte. It is neither fair nor equitable that staff working more than 0.5 fte but still part time, should have to pay the same charge as a person working full time, whether that be working fewer than 5 days a week, or working five days but for a shorter time each day. It would be simple to have a scaleable charge with each 0.1 fte per ½ day worked per week attracting 10% of the full car park charge.

Treasury		Appendix A Disability If an applicant ticks to state they have a Blue Badge, or letter from their doctor or Occupational Health, there is no reason why they should disclose their condition to a non-health professional (e.g. Payroll).
		Appendix B - Parking charges/discounts
DOI		Also, I note that there is a discount applied if you work 0.5ft. I work 0.81ft and therefore would be expected to pay full costs for say an allocated space. On that basis, am I able to use my dedicated space on the day I do not work should I come into Douglas given that I am required to pay for it? The consultation document seems to suggest that for days when a staff member is not in, the accounting Officer can reallocate their space which seems very unfair considering I am already paying for it. And the document states that no staff member should sublet their space – again, I appreciate that this is trying to be fair across the board, however, if I am paying for a space for 5 days a week, and no using it, why should another member of staff benefit from what would be my paid space?
ATL		We have a small number of members who I believe may be affected by the introduction of this policy. Those members who are, use their cars to visit schools amongst other things. Would it be clearer to say those who use their vehicles for business for 1 - 3 days should receive a 50% reduction in Appendix B, in the discounted rates box?
DHSC		I'm not really sure why we have a sliding scale of charges. The main reason anyone uses their car to travel to and from work is for their own convenience. If during the course of the day certain people have to travel to other venues to attend meetings then pool cars should be provided. This would ensure that the no-one has to use their car during the day and everyone can be charged the same for parking. I feel it would look bad if, for example, a CEO ended up paying less for parking than an admin assistant.
Personal	Fees	Appendix B give no detail as to cost. Parking provision is a business, and therefore has inherent overheads, our parking spots are all inclusive in the rental cost of the building so any fee should be lower, but the same for all grades.
		Appendix B give no detail as to cost. Parking provision is a business, and therefore has inherent overheads, our parking spots are all inclusive in the rental cost of the building so any fee should be lower, but the same for all grades.
DEFA		Where public sector employees are required to use their own transport to travel to work and it is a requirement of their employment i.e. to provide a vehicle for business use during the working day, it is suggested that consideration be given to classifying this as 'daily use' in Section 2 of Appendix B
DOI	Definitions	1. The draft policy suggests that essential users are exempt from paying charges; however there is no definition for essential user.

	Questions		
	Question	Regarding the above consultation document. May I ask the rules for this if the board or department you work for has a certain amount of spaces within the footprint of the property that they work at will a charge be made for any car space within that where the rent includes Those car spaces?	
DOI	Question	The general principle for paying for parking is a good one. However I have some reservations which would need to be satisfied before I would be in complete favour:How is essential need for parking, leading to a non-charge for an allocated space decided?Would the person paying have a choice of where they park? Some spaces are very small, others close to large vehicles which come and go frequently and personally would not be prepared to pay for a parking space which would lead to my vehicle being scratched or dented.	
DHSC	Questions	I wondered if there will be anything in place to stop these being claimed back on expenses? I know that a few of my friends pay a fair chunk to park in Douglas as it is, and it'd be a shame if the people who actually have access to free parking spaces were then able to pass the cost elsewhere.	
DED - Tourism/Motors port	Questions	 Why is the applicants salary information being collected on the form, it doesn't say anywhere that charges are based upon their earnings! If I get a space, and follow your guidelines about not leaving it empty, do I have to gift it to a colleague, because according to this I am not allowed to sublet in anyway Why do zero hours contract holders not have to pay? I thought it would be better that they wouldn't be allocated one at all Surely the people who have to travel regularly for their work need the spaces the least? And would be able to manage the musical parking disc routine endemic around office blocks in the town 	
DHA	Questions	Also, is it just my reading of it, or would staff who are required (i.e. told) to use their personal vehicle for business purposes on a daily or intermittant basis and thus parking that vehicle at work would be liable for the parking charge even though they would not otherwise be bringing their personal vehicle into work?	
GITS	Question	Just to clarify – is the proposal to charge for car parking within government buildings such as Hillary House? Or is it for shared public parking owned by IOMG like Chester Street car park etc?	

Gov Analysts		There was a map included with the consultation documents, with some markings in red and others in blue, but no key or explanation, and no indication of affected car parks. Are we to take it that the entirety of the map, but no other area, is that to which the proposed charges apply, or otherwise could a revised map be provided making clear exactly where they apply.
GTS	Questions	Do the parking charges apply to building owned/leased by Government? My thinking for that question is that if we already own (or have paid for in a rental/lease agreement) the building that includes its own parking spaces – then these parking spaces have already been paid for within the cost of the building, so why are we charging again? Where it's spaces in a public car park I understand the reason for charging. The Public see free spaces going to some people and think it's not fair. But where the public don't have any sight of parking spaces, and the spaces have already been paid for within the build/lease cost of the building then I'm not sure that payment is required. Also, in a leased building don't the landlords look after the parking spaces, and that 'looking after' is covered in the lease/rental price – so DoI aren't involved? Or do DoI maintain those building not the landlord? I'm just not sure of the arrangement.
Individual	Question	4. Will the policy apply to all public servants, (ie including the FSC, GSC, IPA) and Members of Tynwald?
DHSC	Question	Rather than submit a comment (on what might be the obvious) can you advise if this policy will apply to healthcare staff in old Nobles and teachers in Ballakermeen and St Ninians
	Question	I presently use my car for work purposes on a daily/weekly basis dependant on events within my working day, we are a short term intervention team, this often requires going out on visits at short notice. Although I do have a regular weekly job for which my car is essential as I need to transport service users due to their physical needs and the jobs I undertake. Looking at the draft it would appear that I would be charged due to not being a guaranteed daily car user. I already pay for upkeep of my car due to extra use at work and also have to clean the car regularly due to various issues around who I need to transport. Could you clarify that I will then be charged on top of this for parking, even though I need to be able to go out at short notice?
Cabinet Office		My other concern is how any Scheme will be administered. Currently as you know I often benefit from being able to park in spaces which are unoccupied due to annual leave, sickness etc. If OHR is still able to operate such a rota, how will this be treated? Will there be a charge levied for using such a space on a daily, weekly or monthly basis?
DED		Current parking spaces in my department are allocated based on grade. Will those allocations have to 'reapply' for the spaces using the Appendix A application form and consequently could they potentially lose their space if they fail to meet the demonstration for requirement?
MUA		I may have to alter my view on the car parking situation. Do some people currently get a free space while others have to find a park and pay? It is not clear from the consultation documents.

Treasury		 Thank you for producing this document, not at an easy task I am sure. I work at Illiam Dhone House and see staff from other buildings using our car park; so this document will iron a few misdemeanours. May I just run a couple of thoughts past you? As mentioned I work in Illiam Dhone House and use the car park underneath; I also have a disabled badge and use my vehicle for work related duties. I am taking a month's annual leave in February, if this policy was in place now and say for example a colleague used my space, would they be charged for a month's usage?
		If I had to work in CGO for instance, would I be able to park there instead of IDH?
	Question	In relation to Police officers. When on duty they are required to be flexible and work for extended periods of time in any part of the Island as directed by the Chief Constable. Would they be exempted or considered an essential user?
DOI		Also, the map showing the car parking areas that this applies to is very poor quality with no key. I work in the Sea Terminal Building – is this one of the areas to be affected by the charges? If it is, and I requested an allocated space, would the allocated space be at my place of work? This information is missing from within the consultation document. I drive in everyday as I leave at 4pm to collect my son from his childminder, and having the ability to walk straight to my car, enables me to get home quickly to collect him. If I applied for an allocated space that was quite a walk from my place of work, it would be of no advantage to me. Public transport would not be an option as it wouldn't get me home in time to collect him. However, I do happily give colleagues lifts when possible.
		every response to the consultation or is the form only to be completed once the policy has been confirmed and staff can then request a car parking space?
		The consultation document does not provide any information on how and when the results of the consultation will be reported. Will responses be made public or will an overview of responses received be reported on? When can we expect this please?
DHSC		 In principle I have no problem with Government charging staff for parking spaces but I do have some concerns: 3) On querying which Government properties would be involved the reply was all properties within the disc zone except St Ninians School and Ballakermeen School, why have these been excluded? 4) What about other schools and Department-owned buildings i.e. GP surgeries in the disc zone will they be exempt as well?
DOI	Question	Having had a quick look at the consultation documents can you clarify whether discounts will be given on a pro rata basis if staff are not working a 5 day week? – i.e a 3 day or 4 day week. This would seem to be a perfectly fair and reasonable suggestion which would be easy enough to calculate and administer.

DHSC	Questions	• Can you please confirm whether the rates given are discounted rates for the first year only? If so, please confirm when the rates will increase and the new rates. Please also advise whether the price will increase annually and at what rate – will there be a maximum?
		• Is there a pro-rata rate for part-time staff?
		What about parking for staff employed on short, fixed-term contacts?
		• Can staff with unallocated / allocated spaces be able to use unallocated spaces in any government car park, e.g. to attend meetings, training, out of hours etc?
		• Can staff use their spaces out of normal office hours, i.e. evenings, bank and public holidays and weekends?
		• Why can't the parking charge be levied on all government staff, irrespective of location with the price being based on grade? It seems extremely unfair that only staff based in central Douglas are being penalised and that the same rate will be charged for everyone, irrespective of grade.
		• If staff have paid for an unallocated space but on occasions there are none available, can they park within a disc zone with no time limit being applied to them?
		• How will this be policed? If extra staff are to be employed, where will they be based and how many will be employed? If barriers are to be erected, how many staff will be employed? What is the annual cost of all the extra work?
		• What is the definition of the term 'Essential users'?
		 Please provide a full explanation of the wording 'discounts depending on the frequency of business usage'.
		• Will the parking charge apply to all the GP surgeries situated in this area as well as contractors to the Department?
		• If staff are on annual / sick leave, can another staff member use the space and will they have to pay?
		• We have members of the public using our spaces occasionally, what action will we be able to take against these people?
		• Can we choose which space we have or will it be allocated and by who?

DOI		I realise I am too late with regard to making an official comment on this consultation but I would say that the timeframe between the endorsement from COMIN and its instigation seems very small to allow for members of staff to apply for a space and the subsequent allocation of spaces. I don't have comments to make so to speak, more questions really. Is the scheme based around the parking allocation as it stands at the moment? For example, I work in Murray House, Mount Havelock and would very much like a space in the car park opposite (where I park at the moment). If I was to go for an allocated space bearing in mind I work for DOI who are mainly based within the Sea Terminal Building I would need to point out that I do not want a space in the Sea Terminal Car Park? And am I to understand the fee for the space is to be deducted from my monthly pay?
DOI	Questions	If a person has to carry out frequent trips during the working day, will they always have an allocated space to return to? Doesl the allocation extend beyond the normal core hours, so that spaces will be avialable outside of these hours? Will the fee be eligible for tyax relief? What is the mechamise for increasing the rates charge?
DHSC	Questions	I would also like clarification as to the proposed on street parking charges. Having looked at the parking charge map it covers a large area of Douglas. Would we need to pay parking charges every time we park in that area when going to visit clients in their home? If so this is a bit of a double whammy for worker's trying to serve the needs of the community. In the past workers were issued a pass to put in their car indicating that they were on official government business and therefore were exempt from parking restrictions. Could this be again considered by this department after all we would not charge a police car, fire engine or ambulance for parking outside of the client's home whilst on a business call. Sorry if this feels like a bit of a rant but just feel that this idea needs further thought
DHSC		1) The map issued is extremely poor quality and we could not identify specifically which car parks would be chargeable and which would not. We would therefore like clarity on which car parks in central Douglas would be affected by parking charge.
DHSC		2) Will it be the Department or DOI who determines which spaces will be chargeable based on essential user criteria?

DHSC	3) What vires does the DOI have to charge for spaces on land that is owned by another Government Department?
DHSC	4) The policy only involves employees working within the disc parking zone in central Douglas – why are these being targeted?
DHSC	5) This feels like those working within the disc zone areas are being discriminated, surely this should be across the whole of the Public Sector/Government! As employees we don't get to have a say where our places of work are located.
DHSC	6) On querying which Government properties would be involved the reply was all properties within the disc zone except St Ninians School and Ballakermeen School, why have these been excluded?
DHSC	 What about other schools and Department-owned buildings i.e. GP surgeries, Community Health Centre and other schools in the disc zone - will they be exempt as well?
DHSC	8) I believe that the paying for disc by households has now been dismissed.

DHSC	9) On the introduction of the consultation document page 2 paragraph 2 it says " it is recognised that provision of free car parking for staff in areas where they public may be charged to park in order to access public services is neither fair nor defensible", some departments may be in the disc zone but no charge is made for the public to access the building surely then no one parking should be charged.
DHSC	10) Ref the comment that "provision of free car parking for staff in areas where the public may be charged to park in order to access public services, is neither fair nor defensible". We are not aware on any government buildings where this applies. If there is such a case the public would presumably be there less than a couple of hours and so have the choice to utilise free disk parking where available and not incur charges. Staff do not have that option as they cannot leave every two hours to move their cars.
DHSC	11) If this is going to happen then is should be across the whole of the Public Sector and Government i.e. Nobles, Ramsey Cottage Hospital, Prison etc
DHSC	12) If we are to pay for parking there needs to be adequate maintenance and lighting for all car parks. Both are currently poor in some areas.
DHSC	13) If charges are to be applied could there be some sort of scale such that lower paid employees pay less than more senior managers?
DHSC	14) I'm not really sure why we have a sliding scale of charges. The main reason anyone uses their car to travel to and from work is for their own convenience. If during the course of the day certain people have to travel to other venues to attend meetings then pool cars should be provided. This would ensure that the no-one has to use their car during the day and everyone can be charged the same for parking. I feel it would look bad if, for example, a CEO ended up paying less for parking than an admin assistant.
DHSC	15) A charge for parking will likely lead to fewer people coming to work in their own cars (as per the intended objective). Will the DOI therefore be providing a larger fleet of pool cars for staff use when travelling to meetings etc around the Island?

DHSC	16) If a job description has "access to own vehicle" (or similar) as 'essential', does this count as being 'expressly included in their Terms and Conditions of service or employment'? What about where access to own vehicle is described as 'desirable'?
DHSC	17) Why is there not proposed to be a charge for motorcycles? They tend to use a whole space when parking.
DHSC	18) Why are staff on zero hours contracts and Agency/contract staff exempted from the charges?
DHSC	19) If we are to pay for parking why should it be up to us to ensure that every effort is made to avoid leaving it unused?
DHSC	20) Will someone be responsible for managing the car parks? If I was paying for a parking space and found someone else had parked in my space what redress would I have?
DHSC	21) Community Nursing staff are based in various buildings around the Island including CCHC at Westmoreland Road, the staff mainly parking in Ballakermeen Road Car park. Some staff are based at Crookall House and use Crookall House car park whilst others are based at Markwell House and they use Chester Street car park apron. Community Nursing staff use both their own vehicles
DHSC	and some Department vehicles to deliver care at home and in communities therefore it is essential that they have a vehicle in order to carry out their work. All community nursing staff based at Crookall House have to have the capacity to use a vehicle on a daily basis as staff are dispersed across the Island. Consideration needs to be given to ensure equity for staff as staff do not have a choice in 22) If charges are to be implemented they should be done fairly throughout all government regardless of where you work or what you do.

DHSC	23) There should be no discrimination between one car park coming under the charges and another being exempt.
DHSC	24) If staff are to be charged they should be guaranteed a parking space rather than paying nearly the full rate for a space every now and then.
DHSC	25) If charges are to be applied then having a charge on everyone working in government should be used as a means of reducing the cost of parking charges across the board rather than the contrary – a way of making more money.
DHSC	26) If charges are to be applied the charges should be pro rata to the individual's earnings.
DHSC	27) If charges are to be introduced could they first be introduced at a lower rate then scaled up over a period of years.
DHSC	28) If we have received free parking for a number of years is that not an implied in our terms & conditions of service under employment law?