



# **Oxfordshire County Council**

## **Equalities Impact Assessment**

Carbon Management Plan Residual Carbon Policy

26 September 2025

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## Section 1: Summary details

<b>Directorate and Service Area</b>	Climate Action, Economy and Place
<b>What is being assessed</b> (e.g. name of policy, procedure, project, service or proposed service change).	Carbon Management Plan Residual Carbon and Offsetting Policy
<b>Is this a new or existing function or policy?</b>	New Policy
<b>Summary of assessment</b>  Briefly summarise the policy or proposed service change. Summarise possible impacts. Does the proposal bias, discriminate or unfairly disadvantage individuals or groups within the community? (following completion of the assessment).	<p>The Carbon Management Plan Residual Carbon Policy sets a framework for Oxfordshire County Council to achieve carbon neutrality by 2030 and maintain it afterwards. It prioritises high-integrity, locally-sourced carbon credits for residual emissions, supports development of local offsetting markets, and ensures alignment with best practice standards, while promoting local environmental and social co-benefits. The types of carbon credit projects enabled by this policy are highly varied, and their impacts will differ across groups. For example, some groups may benefit more from woodland projects, while others may benefit more from retrofit projects.</p> <p>Young people will benefit most from climate change mitigation, as carbon credits support the reduction of emissions that would otherwise impact their future. Tenants in social housing gain warmer homes and improved health outcomes through retrofit schemes, particularly benefitting those with disabilities. Black tenants and those identifying as gay, lesbian, or bisexual also benefit from improved housing and health, as these groups are disproportionately represented in social housing. Rural communities see new income streams from nature-based projects, alongside better water management and resilience to extreme weather. Areas of deprivation benefit from retrofitting and urban tree planting, improving housing and environmental quality. Other council services and providers gain through co-benefits, partnerships, and climate adaptation measures. Social value is enhanced by tender specifications that prioritise climate adaptation, local business partnerships, and carbon neutrality, improving overall well-being in Oxfordshire.</p>

<b>Completed By</b>	Sam Randle, Zero Carbon Council Policy and Project Lead
<b>Authorised By</b>	Sarah Gilbert, Head of Climate Action
<b>Date of Assessment</b>	26/09/2025

## Section 2: Detail of proposal

<p><b>Context / Background</b></p> <p>Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.</p>	<p>The Oxfordshire County Council Carbon Management Plan Residual Carbon Policy sets out a framework for achieving carbon neutrality for the Council's own estate and operations by 2030. The policy outlines how OCC will address the remaining 'residual' emissions of the Carbon Management Plan through the purchase or generation of high-integrity carbon credits—focusing on emissions reductions and removals, not avoidance. Credits are sourced where possible from Oxfordshire-based projects, or those with local co-benefits, while ensuring adherence to recognised standards for integrity and transparency. The policy includes a phased action plan to build local market capacity, develop partnerships, and ensure governance, in response to the limited availability of credits and market immaturity. It aligns with best practice principles and frameworks such as the Oxford Principles for Net Zero Aligned Carbon Offsetting and is partially supported by allocated council funding to forward-purchase credits and stimulate local projects.</p>
<p><b>Proposals</b></p> <p>Explain the detail of the proposals, including why this has been decided as the best course of action.</p>	<p>For the council to achieve carbon neutrality by 2030 it is required to offset the residual of the Carbon Management Plan. The size of this will be minimised through the actions of the Carbon Management Plan, but several factors are out of the council's control, such as grid decarbonisation and the ownership of ICE vehicles by staff mileage claimants.</p> <p>This policy outlines how the council intends to use carbon credits with integrity to avoid greenwashing. It also lays out a plan to develop the local carbon market, recognising that it is currently underdeveloped and OCC plays an important convening role.</p>

<p><b>Evidence / Intelligence</b></p> <p>List and explain any data, consultation outcomes, research findings, feedback from service users and stakeholders etc, that supports your proposals and can help to inform the judgements you make about potential impact on different individuals, communities or groups and our ability to deliver our climate commitments.</p>	<p>This policy was developed following consultation with project developers, carbon brokers, Oxfordshire Local Nature Partnership nature finance working group, and internal stakeholders to understand existing carbon offsetting needs, market dynamics, and the availability of local solutions. It is also based on modelling for the Carbon Management Plan.</p> <p>The evidence base was primarily grey literature, including the Environment Agency's Achieving Net Zero report, CO2RE's Carbon Dioxide Removal report, Climate Change Committee publications, evaluations of existing carbon credit methodologies, and policies or case studies from other local authorities. It also included an analysis of net zero and carbon neutrality standards - existing and emerging - to ensure future alignment.</p> <p>In addition, there are various publicly-available survey results and government demographic publications that have informed where there may be outsized positive impacts for specific types of carbon credit projects.</p>
<p><b>Alternatives considered / rejected</b></p> <p>Summarise any other approaches that have been considered in developing the policy or proposed service change, and the reasons why these were not adopted. This could include reasons why doing nothing is not an option.</p>	<p>Carbon credits from emissions avoidance projects were rejected as a solution due to their historical misuse and the abuse of the methodology. International credits were also rejected as a solution due to challenges in oversight and the lack of co-benefits. Emissions reduction projects like retrofits were also considered for exclusion, but they have strong evidence backing, synergise with existing council initiatives to save cost, and deliver carbon credits and co-benefits immediately.</p> <p>The hierarchical approach to credit procurement could take several forms - focusing primarily on the most rigorous carbon credit methodologies with the longest durability (1000+ years) but this would result in few local benefits in the short-medium term and significantly higher costs, if this were to be applied to the 2030 target. Instead, a hierarchy focused on local benefits will result in a portfolio of purchases, thus distributing risk against any one project failing, ensuring the 2030 target is still achieved, promote nature-based solutions in the medium-long term, and build partnerships for post-2030.</p>



### **Section 3: Impact Assessment - Protected Characteristics**

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
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Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Carbon credits come from projects that remove carbon dioxide from the atmosphere and minimise new emissions, that would not have otherwise taken place were it not for the sale of credits. Climate change will have one of the most significant impacts on young people in the medium to long-term and this policy will support combatting climate change.</p> <p>During the installation of retrofit measures like solar and battery installation there may be temporary disruptions caused by contractor home access and scaffolding. Installation typically lasts a day, and scaffolding stands for a week. For individuals with a mobility challenge related to age this could affect home access.</p>	During other OCC-led retrofit initiatives, installers have worked with residents to identify a time best-suited to them as well as accessibility needs. This has not prevented home access.	Lead to be determined based on feasibility of retrofit credit scheme implementation following policy approval.	Carbon impacts of the council's estate and operations are currently reported in the annual GHG Report. Carbon offsets will be reported in the GHG Report and/or Carbon Management Plan.
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Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Carbon credits from some retrofitting schemes typically come from social housing, resulting in warmer homes and better health outcomes for tenants. One scheme indicates the notional social value uplift per credit is £500. A disproportionate number of social housing tenants live with disability, according to an <a href="#">ONS publication</a>.</p> <p>During the installation of retrofit measures like solar and battery installation there may be temporary disruptions caused by contractor home access and scaffolding. Installation typically lasts a day, and scaffolding stands for a week. For individuals with a mobility-based disability this could affect home access. For those with noise-based sensitivity this could lead to temporary discomfort.</p>	During other OCC-led retrofit initiatives, installers have worked with residents to identify a time best-suited to them as well as accessibility needs. This has not prevented home access.	Lead to be determined based on feasibility of retrofit credit scheme implementation following policy approval.	A leading scheme will last until 2042, though carbon credits from the scheme will decrease in volume substantially once the energy grid decarbonises in 2030, though the retrofits will remain.
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<b>Gender Reassignment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Marriage &amp; Civil Partnership</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Pregnancy &amp; Maternity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Race</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Carbon credits from retrofitting schemes typically come from social housing, resulting in warmer homes and better health outcomes for tenants. One scheme indicates the notional social value uplift per credit is £500. A disproportionate number of social housing tenants are from the Black ethnic category, according to a government <a href="#">survey</a> .			A leading scheme will last until 2042, though carbon credits from the scheme will decrease in volume substantially once the energy grid decarbonises in 2030, though the retrofits will remain.
<b>Sex</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

<b>Sexual Orientation</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Carbon credits from retrofitting schemes typically come from social housing, resulting in warmer homes and better health outcomes for tenants. One scheme indicates the notional social value uplift per credit is £500. A disproportionate number of social housing tenants identify as gay, lesbian or bisexual according to a study from the <a href="#">University of Sterling</a> .			A leading scheme will last until 2042, though carbon credits from the scheme will decrease in volume substantially once the energy grid decarbonises in 2030, though the retrofits will remain.
<b>Religion or Belief</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

### Section 3: Impact Assessment - Additional Community Impacts

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
<b>Rural communities</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Most nature-based carbon credit projects are led by landholders and farmers in and surrounding rural communities, generating a new income stream. Establishing woodland can also contribute to nature-based management of water quality, water resource management and flood risk. On the fringes of towns and woodland can improve air quality, reduce noise pollution and provide resilience to weather extremes such as heavy rain and high summer temperatures, according to the <a href="#">Environment Agency</a> .			Carbon impacts of the council's estate and operations are currently reported in the annual GHG Report. Carbon offsets will be reported in the GHG Report and/or Carbon Management Plan. This will include where projects are based and where possible, associated specific co-benefits.
<b>Armed Forces</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Carers</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (* Job Title, Organisation)	Timescale and monitoring arrangements
Areas of deprivation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Carbon credits from retrofitting schemes typically come from social housing, resulting in warmer homes and better health outcomes for tenants. One scheme indicates the notional social value uplift per credit is £500</p> <p>Urban tree planting is one option for generating carbon credits, and this policy outlines an action to investigate synergies between OCC tree planting activities, which focus on low-scoring LSOAs for tree coverage, which are typically urban and typically poorer.</p>			A leading scheme will last until 2042, though carbon credits from the scheme will decrease in volume substantially once the energy grid decarbonises in 2030, though the retrofits will remain.

### Section 3: Impact Assessment - Additional Wider Impacts

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (* Job Title, Organisation)	Timescale and monitoring arrangements
Staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Other Council Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Providers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Social Value <sup>1</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	When going out to tender for the budgeted actions in the action plan, the tender specification and quality section weighting will include co-benefits such as climate adaptation (especially flooding and heatwaves) and partnerships with local businesses. There will also be a weighting for carbon neutrality or net zero targets and their mobilisation in contract delivery.		Zero Carbon Council Policy and Project Lead	For each tender issued, the assigned officer will adapt the specification and co-benefit requirements. This is because of the wide variety of carbon credit projects and the associated co-benefits.

<sup>1</sup> If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area





## Section 4: Review

Where bias, negative impact or disadvantage is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

<b>Review Date</b>	<b>October 2025</b>
<b>Person Responsible for Review</b>	<b>Zero Cabon Council Policy and Project Lead</b>
<b>Authorised By</b>	<b>Sarah Gilbert, Head of Climate Action</b>