



Oxfordshire County Council

Equalities Impact Assessment

Retendering of the Civil Enforcement Contracts

21.01.25

Annex 2 - EIA

Contents

Section 1: Summary details 3

Section 2: Detail of proposal..... 4

Section 3: Impact Assessment - Protected Characteristics 7

Section 3: Impact Assessment - Additional Community Impacts..... 9

Section 3: Impact Assessment - Additional Wider Impacts..... 9

Section 4: Review12

Section 1: Summary details

Directorate and Service Area	Environment and Highways, Civil Enforcement
What is being assessed (e.g. name of policy, procedure, project, service or proposed service change).	Retendering our current enforcement contracts
Is this a new or existing function or policy?	Existing function
Summary of assessment 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>Policy or Proposed Service Change: The project involves the retendering of Oxfordshire County Council's current enforcement contracts for Civil Enforcement. This is an existing function that aims to continue the enforcement of parking regulations and other related duties.</p> <p>Possible Impacts:</p> <ul style="list-style-type: none"> • Age: The new contract will continue to offer multiple ways to pay Penalty Charge Notices (PCNs) and challenge them, ensuring accessibility for all age groups.. • Disability: Continued enforcement will help respond to reports of non-blue badge holders using disabled bays, ensuring these spaces are available for those who need them.. • Race: Potential language barriers are addressed by offering various ways to contact the service and using translation services available in libraries.. • Other Protected Characteristics: The policy also considers impacts on gender reassignment, marriage and civil partnership, pregnancy and maternity, sex, sexual orientation, and religion or belief, ensuring that services are accessible and fair to all.

Annex 2 - EIA

	Bias, Discrimination, or Unfair Disadvantage: The proposal does not bias, discriminate, or unfairly disadvantage individuals or groups within the community. It aims to provide equitable services and considers various protected characteristics to ensure fairness and accessibility for all.
Completed By	Cathy Champion
Authorised By	Keith Stenning
Date of Assessment	21.01.25

Section 2: Detail of proposal

Context / Background Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.	<p>Oxfordshire County Council first took on the powers of parking enforcement in Oxford City in 1997. The Council has continued to offer Civil Enforcement since. In October 2020 the Cabinet agreed to pursue an application to DfT to take on powers covering Cherwell, Vale of White Horse and South Oxfordshire districts. Enforcement of these districts went live in November 2021.</p> <p>As part of our duty under the legislation we have to have Civil Enforcement Officers and Technology such as ANPR cameras to undertake this duty. The Council currently has five existing contracts with Conduent (now sold to Modaxo and trading as Trelint) are set to expire in March 2026. Oxfordshire County Council therefore needs to get a new contract in place to allow us to perform our statutory duties.</p>
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Annex 2 - EIA

<p>Proposals</p> <p>Explain the detail of the proposals, including why this has been decided as the best course of action.</p>	<p>The outcome of optional appraisal has identified the appointment of an enhanced contracted model with multiple providers to cover all the elements of Civil Enforcement and the ZEZ. It also highlighted that the Council should consider finding its own building to house the enforcement operation rather than pay for a lease through a tendered enforcement contract. The outcome also identified clear separation of elements to be included in the procurement process. To procure specialist contractors for Civil Enforcement, Back-office processing software, ZEZ software and ANPR cameras.</p> <p>It is recommended that this enhanced model is endorsed by Cabinet and for them to give permission for officers to develop the finer details and relevant documentation (specification, contract terms, and pricing schedules) required for procurement of this enhanced model. Cabinet will be asked to approve the specification and details of procurement in July prior to procurement commencing.</p>
<p>Evidence / Intelligence</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>An options appraisal assessment was undertaken. Officers instructed an independent consultant (Parking Matters) to give an overview of the options available to local authorities in terms of enforcement and recommend options for the way forward.</p> <p>At the same time officers undertook their own engagement and research. A member's workshop was held on 19th December and the main feedback from this workshop was:</p> <ul style="list-style-type: none"> • Not enough enforcement on the ground (several areas of concern were expressed such as Cowley Road and enforcement in the Market Towns). • Innovations – smarter enforcement, red routes and the ability for the contract to adapt to changes in legislation for instance pavement parking. • Members wanted more information on and control of performance and deployment. <p>Officers have spoken with other authorities in the country some of whom have brought operations in house and those that still contract their service out, to establish the best opportunities for our service as well as learning from our peers.</p>

Annex 2 - EIA

	<ul style="list-style-type: none"> • Buckinghamshire Council and London Borough of Hackney have an in-house enforcement team. Their PCN software is contracted out and have a separate contract for ANPR cameras. • Slough Council and Reading Council have an out-source enforcement and PCN software solution. Slough have not yet introduced moving traffic enforcement but are intending to do so. The ANPR cameras will be procured in due course. Slough provide the accommodation for the enforcement contractor. <p>Early market engagement with numerous suppliers has also been undertaken. There is strong interest in this procurement.</p>
<p>Alternatives considered / rejected</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>We considered not enforcing, but we have a legal obligation to do so and no enforcement would be detrimental to managing the transport network and have negative impacts on all transport network users.</p> <p>We considered bringing the operation fully in-house, but this has been rejected to be more costly and us not being able to take advantage of improvement in technology as the software used is very specialist to the enforcement industry.</p>

Annex 2 - EIA

Section 3: Impact Assessment - 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
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Through a new contact we would continue to carry out the same processes that we do now, which we are heavily legislatively based.</p> <p>In terms of Penalty Charge Notices (PCNs) that are issued, both directly onto a vehicle or in the post there are a number of ways to pay including phone, online and by post.</p> <p>Legal challenges to PCNs can be undertaken by post or email.</p> <p>The PCNS also state that if you have difficulty reading the notice or require a larger printed version or have another query then the recipient can call the team phone number.</p> <p>Therefore, we will continue to offer this service to all.</p>			

Annex 2 - EIA

Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Parking in disabled bays is a common issue. By continuing to have enforcement it means we can respond to reports of non-blue badge holders and get officers out to issue PCNs to deter abuse of these spaces so they can be used by the people they were designed for.			
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Marriage & Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Pregnancy & Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	It is anticipated there may be potential language barriers for individuals from different cultural backgrounds. As stated above for age we offer different way to contact the service.	As an authority we have the libraries offer an online and in-library dictionaries with two-way translation. There are many free on-line services, such as, google translate, to translate web pages and text themselves.	Already in place, at the libraries and can be done via the user using free web-based translation websites.	Already in place.

Annex 2 - EIA

Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Religion or Belief	<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
Rural communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Armed Forces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Areas of deprivation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

Section 3: Impact Assessment - Additional Wider Impacts

Annex 2 - EIA

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	New contacts allow more control and deployment planning, which should improve number of correspondences the staff deal with.			
Other Council Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	By continuing enforcement this will mean we support other services to maintain a working network.			
Providers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Using the British Parking Contract model this is a collaborative approach to contracts and sets our realistic KPIs			
Social Value ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	We would expect whichever supplier wins the contract to have a strong social value policy in place which would			

¹ 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

Annex 2 - EIA

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
				benefit a wider range of people and the environment. .			

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.

Review Date	
Person Responsible for Review	
Authorised By	