

EQIA Submission – ID Number

Section A

EQIA Title

Moving Traffic Enforcement Policy

Responsible Officer

Vicki Hubert - GT TRA

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

No

Strategy/Policy

Strategy/Policy

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Growth Environment and Transport

Responsible Service

Transportation

Responsible Head of Service

Tim Read - GT TRA

Responsible Director

Simon Jones - GT CDO

Aims and Objectives

The introduction of the Traffic Management Act Part 6 by the Department for Transport (DfT) allows Highway authorities to enforce a variety of moving traffic contraventions via approved Automatic Number Plate Recognition cameras to improve road safety, pollution levels and journey time reliability in locations with low compliance. These are powers not previously available to Highway Authorities. KCC was delegated authority to undertake moving traffic enforcement in July 2022.

KCC now have a supplier on board to assist in fulfilling responsibilities to enforce moving traffic on Kent's roads, and a policy has been compiled to provide guidance on how KCC intend to apply the Traffic Management Act Part 6 legislation to the Kent highway network. The policy also sets out the approach to be followed by authorised officers when making decisions in respect of KCC's compliance and enforcement activities:

- a) Provide clarity and transparency on how KCC operate the Moving Traffic Enforcement (MTE) powers.
- b) Ensure enforcement is consistent and proportionate to the contraventions involved.
- c) Encourage an element of flexibility through technology and human input to ensure Penalty Charge Notices (PCNs) are not unfairly issued or pursued.
- d) Set out clearly what is expected from the public in terms of compliance.

Screening has shown that some of the protected groups will be impacted in both negative and positive

ways. This has been addressed through the action plan.

Conclusion:

No change is required. The evidence suggests that there is no potential for discrimination and all appropriate measures have been taken to advance equality and foster good relations between the protected groups.

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

Yes

Is there national evidence/data that you can use?

Yes

Have you consulted with stakeholders?

Yes

Who have you involved, consulted and engaged with?

Residents: 12 sites have been/are out for consultation. The consultation stage of this project has its own separate EqIA and DPIA. Residents are asked to either support or object to schemes and their comments are taken into consideration before next steps are taken.

KCC Staff: Officers in Transport division are immersed in this subject through regular contact with the Department for Transport and British Parking Association, including forums with other LAs going through this process; KCC's Consultation and Creative Services teams have assisted greatly with the consultation process, which includes an accessible Word and Large Print version of the website content, promotional posters and newspaper adverts and details of how people can request hard copies and alternative formats on all consultation material.

National Highways: liaison to discuss impact on Strategic Road Network and how KCC may be effective in enforcing on NH roads in Kent.

Other authorities: Liaison with other LAs through the British Parking Association to discuss how they have rolled out the enforcement powers. They have provided useful advice on public engagement, enforcement locations, and numbers of ANPR cameras, operational issues and procurement. We are not aware of any other LA having a policy document to support this project.

Please note: no external consultation has been undertaken specifically on the policy document. It will be uploaded onto our moving traffic enforcement webpage for transparency.

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

No

Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff Staff/Volunteers
Residents/Communities/Citizens Residents/communities/citizens
Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?
Yes
Details of Positive Impacts
Older people, younger people and people with a disability will benefit from the enforcement of moving traffic offences. Older people that use their Bus Pass to access public transport services will benefit from more reliable bus journey times with less delays owing to congestion or private vehicles using the bus lanes. This also applies to students who use bus services to get to school, possibly through use of the Young Person's Travel Pass. People with a disability may rely on public transport to get around. Public transport efficiency and reliability will improve through the enforcement of moving traffic offences. In addition, congestion will decrease, and road safety and air quality will improve.
Negative impacts and Mitigating Actions
19. Negative Impacts and Mitigating actions for Age
Are there negative impacts for age?
Yes
Details of negative impacts for Age
People that don't have the skills to use a computer or access to a computer may not be able to access the policy document online.
Mitigating Actions for Age
The option to supply the policy document in alternative formats and in larger font will be investigated.
Responsible Officer for Mitigating Actions – Age
Vicki Hubert
20. Negative impacts and Mitigating actions for Disability
Are there negative impacts for Disability?
Yes
Details of Negative Impacts for Disability
People that don't have the skills to use a computer or access to a computer may not be able to access the policy document online.
Mitigating actions for Disability
The option to supply the policy document in alternative formats and in larger font will be investigated.
Responsible Officer for Disability
Vicki Hubert
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
No
Details of negative impacts for Sex
Not Applicable
Mitigating actions for Sex
Not Applicable
Responsible Officer for Sex
Not Applicable
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender
No

Negative impacts for Gender identity/transgender
Not Applicable
Mitigating actions for Gender identity/transgender
Not Applicable
Responsible Officer for mitigating actions for Gender identity/transgender
Not Applicable
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
Yes
Negative impacts for Race
People that don't have the skills to use a computer or access to a computer may not be able to access the policy document online.
Mitigating actions for Race
The option to supply the policy document in alternative languages will be investigated.
Responsible Officer for mitigating actions for Race
Vicki Hubert
24. Negative impacts and Mitigating actions for Religion and belief
Are there negative impacts for Religion and belief
No
Negative impacts for Religion and belief
Not Applicable
Mitigating actions for Religion and belief
Not Applicable
Responsible Officer for mitigating actions for Religion and Belief
Not Applicable
25. Negative impacts and Mitigating actions for Sexual Orientation
Are there negative impacts for Sexual Orientation
No
Negative impacts for Sexual Orientation
Not Applicable
Mitigating actions for Sexual Orientation
Not Applicable
Responsible Officer for mitigating actions for Sexual Orientation
Not Applicable
26. Negative impacts and Mitigating actions for Pregnancy and Maternity
Are there negative impacts for Pregnancy and Maternity
No
Negative impacts for Pregnancy and Maternity
Not Applicable
Mitigating actions for Pregnancy and Maternity
Not Applicable
Responsible Officer for mitigating actions for Pregnancy and Maternity
Not Applicable
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships
Are there negative impacts for Marriage and Civil Partnerships
No
Negative impacts for Marriage and Civil Partnerships
Not Applicable
Mitigating actions for Marriage and Civil Partnerships
Not Applicable

Responsible Officer for Marriage and Civil Partnerships
Not Applicable
28. Negative impacts and Mitigating actions for Carer's responsibilities
Are there negative impacts for Carer's responsibilities
No
Negative impacts for Carer's responsibilities
Not Applicable
Mitigating actions for Carer's responsibilities
Not Applicable
Responsible Officer for Carer's responsibilities
Not Applicable