

**ANNUAL MEETING OF THE  
PATROL ADJUDICATION JOINT COMMITTEE  
Agenda**

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**Date:** Tuesday 15<sup>th</sup> July 2025  
**Time:** 11.00 am  
**Venue:** Bevin Hall, Local Government Association, 18 Smith Square,  
London, SW1P 3HZ

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**1. Appointment of Chair**

To appoint a Chair for the municipal year 2025/26.

**2. Appointment of Vice Chair**

To appoint a Vice Chair for the municipal year 2025/26.

**3. Apologies for Absence**

To note any apologies for absence received and report verbally any additional apologies received on the day (Pages 4-6, enclosed).

**4. Declarations of Interest**

To provide an opportunity for Members and Officers to declare any disclosable pecuniary and non-pecuniary interests and for Members to declare if they have pre-determined any item on the agenda.

**5. Minutes of the Previous Meeting**

To approve the minutes of the previous meeting of the PATROL Adjudication Joint Committee held on 9<sup>th</sup> July 2024 as a correct record (Pages 7-16, enclosed).

**6. Chair's Update (Verbal Update)**

To provide the Joint Committee with a general update since the last meeting.

7. **Chief Adjudicator's General Progress Report**  
To receive the Chief Adjudicator's General Progress Report (Pages 17-26, enclosed).
8. **Adjudicators' Annual Report**  
To receive the Adjudicators' Annual report (Pages 27-49, enclosed).
9. **Reappointment of Adjudicators for a Five-Year Period**  
To note the reappointment of adjudicators for a five-year period (Pages 50-52, enclosed).
10. **Draft Annual Return 2024/25**  
To approve the Draft Annual Return 2024/25 and note supporting documentation (Pages 53-74, enclosed).
11. **Budget Monitoring Update for 2025/26**  
To consider a report on the Income and Expenditure position at 31<sup>st</sup> May 2025 for the year 2025/26 including the Reserves position at 31<sup>st</sup> May 2025 against the approved Reserves levels in order to comply with the approved Financial Regulations (Pages 75-78, enclosed).
12. **Expenditure Falling Outside of the Financial Regulations**  
To consider a report on any expenditure falling outside of the Financial Regulations (Pages 79-81, enclosed).
13. **Risk Management Documentation**  
To note the latest review of the Risk Register and Risk Framework (Pages 82-86, enclosed).
14. **Establishment of the Executive Sub Committee**  
To establish an Executive Sub Committee and appoint members for the period until the annual meeting of the Joint Committee in July 2026 (Pages 87-90, enclosed).
15. **The Winners of the Driving Improvement Awards 2024-Update**  
To note a report updating the Joint Committee on how Brighton & Hove City Council and North Essex Parking Partnership (the winners of the Driving Improvement Awards 2024) utilised the £25,000 funding which was allocated to deliver their awareness campaigns focused on the subject of 'Abuse of Civil Enforcement Officers' (Pages 91-132, enclosed).
16. **User Group Workshops - June-July 2025**  
To receive a report on the user group workshops - June-July 2025 (Pages 133-136, enclosed).

17. **An Overview of the Key Cases Website and the Judicial Process**

To receive a presentation from Caroline Hamilton, Chief Adjudicator on the Key Cases Website and the Judicial Process.

18. **Public Affairs Report**

To note the Public Affairs report during 2025 (Pages 137-144, enclosed).

19. **Date of next meeting**

To note the date of the next meeting as follows:-

Tuesday 14<sup>th</sup> July 2026-venue TBC.

For requests for further information or to submit apologies please contact: Sarah Baxter, Democratic Services and Policy Manager Tel: 01625 445576 E-Mail: [sbaxter@patrol.gov.uk](mailto:sbaxter@patrol.gov.uk)

For further information on any of the reports contained within the agenda, please contact Laura Padden, Director of PATROL, email: [info@patrol.gov.uk](mailto:info@patrol.gov.uk)

# ITEM 3

## PATROL Adjudication Joint Committee – 15<sup>th</sup> July 2025

### Apologies

#### Councillors

Councillor James Higginbottom – Barnsley Council  
Councillor Joel Hirst – Bath and North East Somerset Council  
Councillor Les Phillimore – Blaby District Council  
Councillor Paula Burdess – Blackpool Council  
Councillor Jacquelin Thomas – Blaenau Gwent County Borough Council  
Councillor Liz Clements – Birmingham City Council  
Councillor Jim Clune – Borough of Broxbourne Council  
Councillor Paul Davies – Bridgend County Borough Council  
Councillor Darryl Sankey – Brentwood Council  
Councillor Nigel George – Caerphilly County Borough Council  
Councillor Alex Beckett – Cambridgeshire County Council  
Councillor Dan De'Ath – Cardiff City Council  
Councillor Liz Blackshaw – Charnwood District Council  
Councillor Peter Jeffries – Cheltenham Borough Council  
Councillor Mark Goldsmith – Cheshire East Council  
Councillor Kate Sarvent – Chesterfield Borough Council  
Councillor Harsha Desai – Chichester District Council  
Councillor Adrian Lowe – Chorley Borough Council  
Councillor Glyn Jones – City of Doncaster Council  
Councillor Dan Rogerson – Cornwall Council  
Councillor Carmel Swan – Derby City Council  
Councillor John Shuttleworth – Durham County Council  
Councillor Sarah Copley – East Herts District Council  
Councillor Martin Foster – East Lindsey District Council



Councillor Paul West – East Riding of Yorkshire Council

Councillor Tom Cunningham – Essex County Council

Councillor Polly Blakemore – Folkestone & Hythe District Council

Councillor John McElroy – Gateshead Council

Councillor Daffyd Meurig – Gwynedd Council

Councillor Alan Oliver – Hart District Council

Councillor Richard Brown – Havant Borough Council

Councillor Tyler Hawkins – Kirklees Council

Councillor Tony Brennan – Kowsley Council

Councillor Warren Goldsworthy – Lancashire County Council

Councillor Michael Cheyne – Lincolnshire County Council (Sent a Substitute)

Councillor Kayleigh Brooks – Leeds City Council

Councillor Geoff Whittle – Leicester City Council

Councillor Charles Whitford – Leicestershire County Council

Councillor Colin Swansborough – Lewes & Eastbourne Councils  
(Eastbourne)

Councillor Nick Kortalla-Bird – Lewes & Eastbourne Councils (Lewes)

Councillor Tracey Rawlins – Manchester City Council

Councillor Sarah Cox – Melton Borough Council

Councillor Graham Plant – Norfolk County Council

Councillor Helen Walker – North Devon Council

Councillor Chris McGiffen – North Northamptonshire Council

Councillor Michael Wyatt – North West Leicestershire District Council

Councillor Gill Heesom – Newcastle-under-Lyme Borough Council

Councillor Sandra Graham – North Tyneside Council

Councillor Mark Canniford – North Somerset Council

Councillor Chris Goodwin – Oldham Council

Councillor John Stephens – Plymouth City Council

Councillor Peter Candlish – Portsmouth City Council

Councillor Geoff Hill – Royal Borough of Maidenhead & Windsor

Councillor Hannah Avery – Reigate & Banstead Borough Council

Councillor Andrew Walmsley – Rossendale Borough Council

Councillor Christine Wise – Rutland County Council

Councillor Rob Wilson – Shropshire Council  
Councillor Mike McCusker – Salford City Council  
Councillor Richard Wilkins – Somerset Council  
Councillor Wesley Roberts – South Ribble Borough  
Council Councillor Margaret Meling – South Tyneside Council  
Councillor Rita Heseltine – South Staffordshire Council  
Councillor Daniel Cowan – Southend-on-Sea City Council (Sent a Substitute)  
Councillor Andrew Stevens – Swansea Council  
Councillor Chris Chambers – Suffolk County Council  
Councillor Matt Furniss – Surrey County Council  
Councillor Dave Davis – Tonbridge & Malling Borough Council  
Councillor Rob Wormington – Tunbridge Wells Borough Council  
Councillor Steve Adshead – Trafford Council  
Councillor Hayleigh Gascoigne – Vale of White Horse District Council  
Councillor Tony Fairclough – Waverley Borough Council  
Councillor Adam Bridgewater – West Devon Borough Council  
Councillor Nicola Pryce-Roberts – West Lancashire Borough Council  
Councillor Lidia Arciszewska – West Oxfordshire District Council  
Councillor Adrian Betteridge – Wokingham Borough Council  
Councillor Rita Garner – Worthing Borough Council

#### Officers

Jason Passfield – Adur and Worthing Councils  
Emma Barker – Sheffield City Council

Minutes of a meeting of the

## **PATROL Adjudication Joint Committee**

held on 9 July 2024 held in the Bevin Hall, Ground Floor, 18 Smith Square, London,  
SW1P 3HZ

### **PRESENT**

Councillor Stuart Hughes (Devon County Council) in the Chair  
Councillor Paula Burdess - Blackpool Council  
Councillor Trevor Muten - Brighton & Hove City Council  
Councillor Will Mee - Broxtowe Borough Council  
Councillor Neil Shailer - Cambridgeshire County Council  
Councillor Tony Sherlock - Chelmsford City Council  
Councillor Laura Crane - Cheshire East Council  
Councillor Jon Andrews - Dorset Council  
Councillor Andrew McAndrew - East Herts District Council  
Councillor Alan Williamson - Epsom & Ewell Borough Council (Substitute)  
Councillor Michelle Morris - Fylde Borough Council  
Councillor Ben Clayton - Hartlepool Borough Council  
Councillor Paul Richards - Hertsmere Borough Council  
Councillor Mark Ieronimo - Hull City Council  
Councillor Vanessa Churchman - Isle of Wight Council  
Councillor Sam Riches - Lancaster City Council  
Councillor Emma Stephens - Maldon District Council  
Councillor Helen Walker - North Devon District Council  
Councillor Jonathan Pessol - North Kesteven District Council  
Councillor Matthew Binley - North Northamptonshire Council  
Councillor Julie Day - North Tyneside Borough Council  
Councillor Chris Aldred - North Yorkshire Council  
Councillor Carl Quartermain - Recar & Cleveland Borough Council  
Councillor Michael Cressey - Runnymede Borough Council  
Councillor Christine Wise - Rutland County Council  
Councillor Henry Nottage - Sheffield City Council  
Councillor Subhash Mohindra - Slough Borough Council  
Councillor Guy Pannell - South Hams District Council  
Councillor Sam James - Lawrie - South Oxfordshire District Council  
Councillor Mary Bing Dong - Spelthorne Borough Council  
Councillor Grace Baynham - Stockport Metropolitan Borough Council

Councillor Lorraine Grocott - Stratford -on-Avon-District Council  
Councillor Sarah Nelmes - Three Rivers District Council  
Councillor Maureen Flood - Test Valley Borough Council  
Councillor Geof Driscoll - Uttlesford District Council  
Councillor Katya Dray - Warwick District Council  
Councillor Mike Eyles - Westmorland and Furness Council  
Councillor Stephen Hibbert - West Northamptonshire Council  
Councillor Paul Fishwick - Wokingham Borough Council

## **OFFICERS IN ATTENDANCE**

Sarah Baxter - PATROL  
Andy Diamond - PATROL  
Patrick Duckworth - PATROL, Communications Consultant  
Laura Padden - Director, PATROL  
Iain Worrall - PATROL  
Caroline Hamilton - Chief Adjudicator, Traffic Penalty Tribunal

## **IN ATTENDANCE**

Tom Gallagher - Lambeth Council  
Paul Nicholls - Advisory Board  
Marc Samways - Advisory Board

## **1.APPOINTMENT OF CHAIR**

Consideration was given to the appointment of Chair.

## **RESOLVED**

That Councillor Stuart Hughes be appointed as Chair for the 2024/25 year.

## **2.APPOINTMENT OF VICE CHAIR**

Consideration was given to the appointment of Vice Chair.

## **RESOLVED**

That Councillor Graham Burgess be appointed as Vice Chair for the 2024/25 year.

## **3.APOLOGIES FOR ABSENCE**

In addition to the apologies listed within the agenda pack further apologies were received as follows:-

Councillor Emma Evans, Adur & Worthing Council, Councillor Manda Rigby, BATHNES, Councillor David Pidwell, Bassetlaw District Council, Councillor Les Phillimore, Blaby Council, Councillor David Chadwick, Bolton Metropolitan Borough Council, Councillor Paul Davies, Bridgend County Borough Council, Councillor Steve Broadbent, Buckinghamshire Council, Colin Hutchinson, Calderdale Borough Council, Councillor Liz Blackwood, Charnwood Borough Council, Councillor Gareth Tranter, Central Bedfordshire Council, Councillor Yasmin Khan, Crawley Borough, Councillor Marilyn Peters, Dartford Borough Council, Councillor Joseph Blackman, Doncaster City Council, Councillor Barry Durkin, Herefordshire Council, Councillor Ian Hollidge, East Sussex County Council, Herefordshire Council, Councillor Vanessa Alexander, Hyndburn Borough Council, Councillor Adam Clarke, Leicester City Council, Javed Hussain, Luton Borough Council, Councillor Marion Williams, Newcastle City Council, Councillor Gillian Heesom, Newcastle-under-Lyme Borough Council, Councillor Graham Plant, Norfolk County Council, Councillor Neghat Khan, Nottingham City Council, Councillor Rob Roze, Nuneaton & Bedworth Borough Council, Councillor Peter Candlish, Portsmouth City Council, Councillor Hannah Avery, Reigate and Banstead Borough Council, Councillor Geoff Hill, Royal Borough of Windsor & Maidenhead, Councillor Becky Williams, Rushmoor Borough Council, Councillor Irene Roy, Sevenoaks District Council, Councillor Daniel Cowan, South-end-on-Sea City Council, Councillor Charmaine Morgan, South Kesteven District Council, Councillor Dan Morris, Shropshire Council, Councillor Andrew Stevens, Swansea City Council, Councillor Mick Berry, Tendring District Council, Councillor Joanne Bright, Thanet District Council, Councillor Dave Davis, Tunbridge Wells Borough Council, Councillor Armaan Khan, Wakefield Council, Councillor Ian Stotesbury, Watford Borough Council, Councillor Paul Prescott, Wigan Council, Councillor Nick Holder, Wiltshire Council and Councillor Kate Ravilious, York City Council.

Further apologies were also received from Richard Hibbert Cheshire East Council Matt Jones, Lincolnshire County Council, Richard Waters, Carmarthenshire.

#### **4.DECLARATIONS OF INTEREST**

There were no declarations of interest.

#### **5.MINUTES OF THE PREVIOUS PATROL ADJUDICATION SERVICE JOINT COMMITTEE MEETING HELD ON 11 JULY 2023**

##### **RESOLVED**

That the minutes of the previous PATROL Adjudication Service Joint Committee meeting held on 11 July 2023 be approved as a correct record and signed by the Chair.

#### **6.CHAIR'S UPDATE**

The Chair reported on the following matters:-

- The general election result.
- Future engagement with the newly elected government.
- The Driving Improvement Awards.
- The presentation on blude badge fraud.
- Reduction in the PCN levy charge.
- The Members' Portal.
- Welcome to new Members

## **7. CHIEF ADJUDICATOR'S GENERAL PROGRESS REPORT**

Consideration was given to the Chief Adjudicator's General Progress report.

The Chief Adjudicator, Caroline Hamilton attended the meeting and provided an overview of her role and the role of the adjudicators alongside a summary of the general progress report including the appeals received, the types of hearings held, proxy cases and case closure times.

### **RESOLVED**

That the report be noted.

## **8.ADJUDICATORS' ANNUAL REPORT**

Consideration was given to the Adjudicators' Annual report.

Presented to Members was information on the adjudicators' workload, judicial review applications, the key cases website, training and appraisals undertaken by adjudicators as well as a list of current adjudicators.

Questions were asked in respect of whether the increase in appeals in 2023 related to poor advertising of the legislation or down to the cost of living and whether the tribunal monitored the consistency/inconsistency in respect of appeal decisions made by authorities.

### **RESOLVED**

That the report be noted.

## **9.DRAFT ANNUAL RETURN 2022/23**

Consideration was given to a report on the draft Annual Return for the year 2023/24.

A question was raised in respect in respect of the minimum threshold for the reserves as well as a comment made in respect of ensuring that the amount of money being held in reserve was necessary.

## **RESOLVED**

That the Joint Committee for PATROL:-

1. Noted the outturn position against the 2023/24 budget included with the report **(Appendix 1) – subject to external audit validation.**

2. Approved the **surplus** for the year of £450,163 to be added to the Joint Committee's Reserves. This excluded the £222,648 being the total of Highways England (Dartford-Thurrock River Crossing) and Halton Borough Council.

3. Determined that the Executive Sub Committee review the basis for defraying expenses, following budget monitoring at the half year point, at their meeting in October 2024.

4. Noted the Balance Sheet **(Appendix 2)** and Cash Flow **(Appendix 3)** and audit timetable.

5. Noted the Small Bodies Draft Annual Return submitted for External Audit **(Appendix 4).**

6. Noted the Annual Internal Audit Report 2023/24 **(Appendix 5).**

## **10. BUDGET MONITORING UPDATE FOR 2024/25**

Consideration was given to a report on the Income and Expenditure position at 31<sup>st</sup> May 2024 for the year 2024/25 including the reserves position at 31<sup>st</sup> May 2024 against the approved reserves levels in order to comply with the approved financial regulations.

## **RESOLVED**

1. That the Income and Expenditure position at 31<sup>st</sup> May 2024 for the year 2024/25 be noted.

2. That the Reserves position at 31<sup>st</sup> May 2024 against the approved reserves levels be noted.

## **11. REVIEW OF FINANCIAL DOCUMENTATION**

Consideration was given to the following documentation:-

- a. Financial Regulations 2024/2025
- b. Scheme of Financial Delegation 2024/2025
- c. Managers Expenses Policy 2024/2025
- d. Staff Expenses Policy 2024/2025
- e. Non-Staff Expenses Policy 2024/25
- f. Expenditure Falling Outside the Financial Regulations (2023/24)

Questions were asked in respect of the mileage rates and whether these were set at a higher rate than the rates set by HMRC, particularly as any mileage claims over 10,000 miles would incur a national insurance contribution. A further query was raised regarding car hire cost which was felt too low and whether there were any plans in place to change the electric vehicle charge rates.

The Director agreed to check that Cheshire East Council's policy was correct in terms of the 10,000 miles as it was this policy PATROL was bound by, given PATROL's host authority provided certain contracted services for the organisation.

## **RESOLVED**

That the policies listed above be adopted.

## **12.REVIEW OF THE STANDING ORDERS**

Consideration was given to a report requesting approval one minor amendment to the Standing Orders.

## **RESOLVED**

That the removal of the Assistant Vice Chair position be removed from the Standing Orders.

## **13.RISK MANAGEMENT FRAMEWORK**

Consideration was given to a report providing a summary of the most significant threats facing the Joint Committee which may prevent or assist with the achievement of its objectives.

## **RESOLVED**

That the current assessment of risk be noted.



#### **14.ABOLITION OF THE PATROL ADJUDICATION JOINT COMMITTEE RESOURCES WORKING GROUP AND SUB COMMITTEE**

Consideration was given to a report in respect of the abolition of the PATROL Adjudication Joint Committee Resources Working Group and Sub Committee.

#### **RESOLVED**

That the abolition of the PATROL Adjudication Joint Committee Resources Working Group and Sub Committee be noted.

#### **15.ESTABLISHMENT OF THE EXECUTIVE SUB COMMITTEE**

Consideration was given to a report setting out arrangements for the Joint Committee to establish an Executive Sub Committee and its Terms of Reference for the coming year.

#### **RESOLVED**

1.That an Executive Sub Committee to act on behalf of the Committee until its annual meeting in July 2025 be established by the Joint Committee, in accordance with paragraph two and appendix one of the report and that members be appointed to the Executive Sub Committee for the forthcoming year.

2.That the Terms of Reference of the Executive Sub Committee be approved.

3.That it be noted the date of the first meeting of the Executive Sub Committee would take place on 15<sup>th</sup> October 2024.

#### **16.AMENDMENTS TO THE TERMS OF REFERENCE-ADVISORY BOARD**

Consideration was given to a report outlining several amendments to the Advisory Board's terms of reference.

#### **RESOLVED**

That the amendments to the Advisory Board's terms of reference be approved.

#### **17.APPOINTMENTS TO THE ADVISORY BOARD**

Consideration was given to a report setting out the terms of reference for the Advisory Board.

#### **RESOLVED**

1.That the appointment of Matt Jones from Lincolnshire County Council for an indefinite period be approved.

2.That the appointment of Mark Fletcher from National Highways for an indefinite period be approved.

3.That it be noted all previous appointments would be for an indefinite period in line with the changes to the Advisory Board's terms of reference.

## **18.PUBLIC AFFAIRS REPORT**

Consideration was given to a report which provided an overview of current traffic management issues.

Laura Padden, the Director of PATROL also provided a more detailed update in relation to the following matters:-

- Preparation of a 'welcome pack' for the new Transport Minister which would also including a request for an update on the delay in implementing tranche 3 moving traffic powers.
- Level of PCN charges and the research undertaken.
- Government consultation on restricting the surplus made by councils regarding PCN fines.
- Private parking and debt recovery fees.
- Pavement parking.
- Parliamentary activity.

The following questions/comments were put forward:-

- Would there be a further update to members on the issues contained within the report in the light of changes to government?
- PCN charges were less than London, would PATROL consider looking at putting forward a regional model of PCN charges?
- A need was emphasised to act on pavement parking including every authority taking the opportunity to individually write to their MPs and the new Minister in a call for action on pavement parking.
- Request for a template letter to be shared with Members that outlined key issues Members could use if required.
- To what extent did PATROL have an input into the issues around pavement parking?
- Vehicles blocking dropped kerbs was another significant issue alongside pavement parking.

- If councils were not given powers to enforce pavement parking what would the alternatives be?
- Each authority should put forward a solution to the DfT in respect of pavement parking.
- Each authority should be contacting their own MPs directly to highlight the issue of pavement parking.
- Parking on grass verges and outside of schools was also a significant issue.
- Did PATROL have any influence on the length and size of parking bays installed in car parks?
- Relationship between pavement parking and formalised pavement parking whereby have parking bays were painted on pavements- was there a distinction between the two?

## **RESOLVED**

That the public affairs report be noted.

## **19.PRESENTATION ON BLUE BADGE FRAUD**

Members received a presentation from Tom Gallagher, Parking Fraud Investigations Manager at Lambeth Council on blue badge fraud.

The following questions/comments were put forward:-

- Should blue badge holders be allowed to park on double yellow lines given those lines were there for safety reasons.
- Were there any proposals to extend the three-hour time limit particularly for those motorists at work all day.
- Blue badge fees.
- Why was the photo on the blue badge not displayed on the front of the badge.
- The differences between the misuse of blue badges and blue badge fraud.
- Request for detailed information to be included on the badge regarding the rules around how blue badges should be used.

## **RESOLVED**

That the presentation and comments raised be noted.

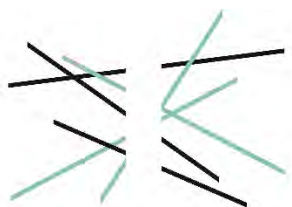
## **20.DATE OF NEXT MEETING**

It was noted that the date of the next meeting of the PATROL Adjudication Joint Committee would take place as follows:-

Tuesday 15<sup>th</sup> July 2025 - venue to be confirmed.

The meeting commenced at 11am and concluded at 1.05pm.

Councillor Stuart Hughes (Chair)



**Traffic Penalty  
Tribunal** England and  
Wales

## General Progress Report – to March 2025

### 1. Appeals summary

#### 1.1 PCNs appealed – General Trends pre and post pandemic

The below table and graph show PCNs appealed to the Tribunal from 1 April 2019 to 31 March 2025 (19/20 being predominantly pre pandemic, 24/25 being post pandemic).

	Totals		Like for Like *		Parking and BL/MT only **	
	number	% change	number	% change	number	% change
<b>2018/19</b>	30,790		30,790		15,766	
<b>2019/20</b>	35,303	14.7%	35,303	14.7%	15,822	0.4% <i>full year</i>
<b>2020/21</b>	18,122	-48.7%	18,122	-48.7%	9,844	-37.8% <i>full year</i>
<b>2021/22</b>	26,337	45.3%	19,682	8.6%	11,809	20.0% <i>full year</i>
<b>2022/23</b>	29,963	13.8%	21,693	10.2%	12,208	3.4% <i>full year</i>
<b>2023/24</b>	37,038	23.6%	25,335	16.8%	14,552	19.2% <i>full year</i>
<b>2024/25</b>	38,493	3.9%	30,327	19.7%	15,847	8.9% <i>full year</i>
2024/25 of 2019/20      109.0%      85.9%      100.2%						

\* Like for Like excludes CAZ

\*\* excludes CAZ and RUC

compares pre pandemic to now

	PCNs appealed				PCNs appealed	
	22/23	23/24	24/25	YoY change	19/20	24/25 v 19/20
Parking - England	6,949	8,933	9,596	7.4%	9,668	-0.7%
Parking - Wales	612	756	770	1.9%	770	0.0%
Bus Lanes	4,544	4,699	4,424	-5.9%	5,229	-15.4%
Moving Traffic	103	164	1,057	544.5%	155	581.9%
Dartcharge	8,478	9,567	13,559	41.7%	8,534	58.9%
LFV	9	25	31	24.0%	4	675.0%
Mersey Gateway	998	1,185	881	-25.7%	10,943	-91.9%
CAZ	8,270	11,703	8,166	-30.2%	0	0.0%
Durham	0	6	9	50.0%	0	0.0%
<b>Total</b>	<b>29,963</b>	<b>37,038</b>	<b>38,493</b>	<b>3.9%</b>	<b>35,303</b>	<b>9.0%</b>
	0	0	0		0	

like for like - exc CAZ	21,693	25,335	30,327	19.7%	35,303	30,327	-14.1%
exc CAZ and RUCA	12,217	14,583	15,887	8.9%	15,826	14,583	-7.9%

Throughout this report RUC refers to Dartcharge and Mersey Gateway

### Key points:

- Overall increase in PCNs appealed between 23/24 and 24/25 of 3.9%
- Change by appeal stream appeals between 23/24 and 24/25 as follows:
  - Parking England 7.4%
  - Parking Wales 1.9%
  - Bus Lanes -5.9%
  - Moving Traffic 544.5%
  - Dartcharge 41.7%
  - Littering From Vehicles 24.0%
  - Mersey Gateway -25.7%
  - CAZ -30.2%
  - Durham 50.0%
- 24/25 compared 19/20, pre and post pandemic, are as follows:
  - Total is 9.0% higher than pre pandemic levels – this is predominantly due to Moving Traffic appeals
  - Like for Like (exc CAZ) is 86.0% of pre pandemic levels
  - Parking appeals are almost level with pre pandemic levels
  - Bus Lane appeals are 85% of pre pandemic levels
  - Dartcharge appeals are 58.9% higher than pre pandemic levels
  - Mersey Gateway appeals are 91.9% lower than pre pandemic levels

### Split between types of appeals.

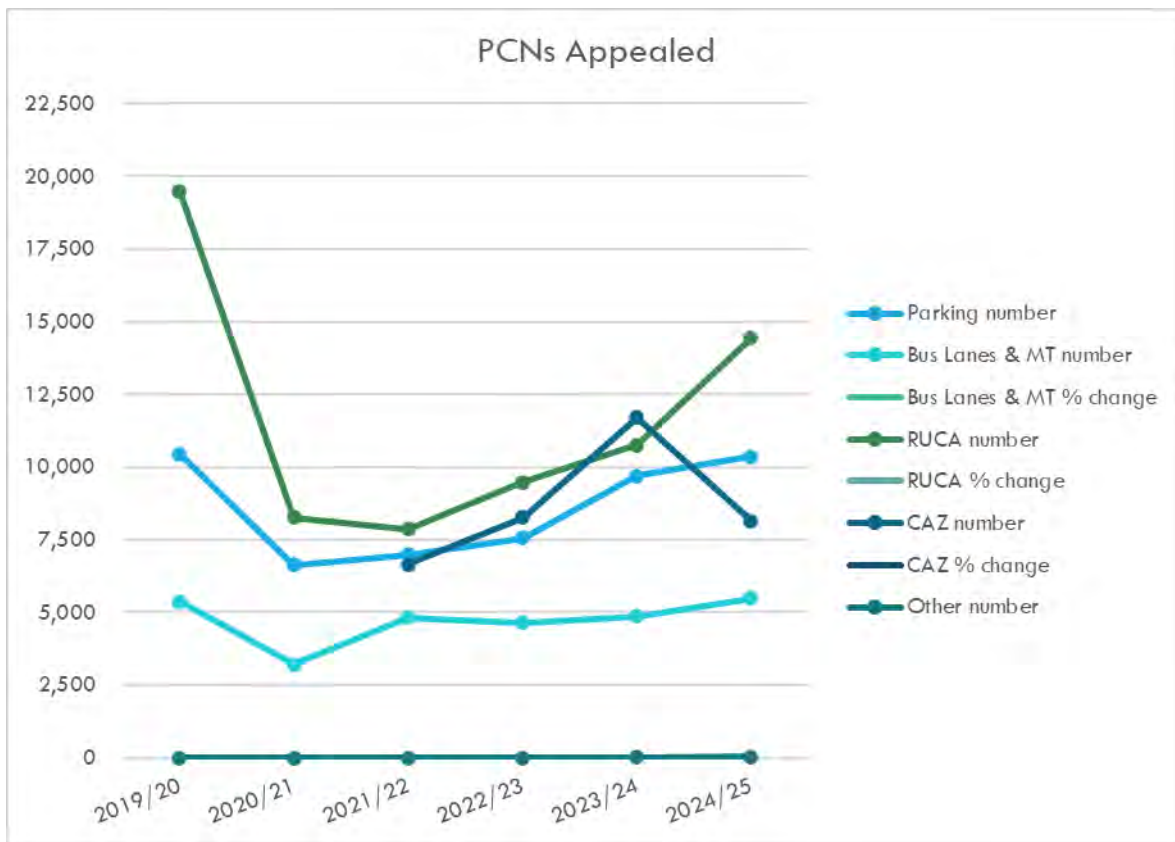
## Proportions

\*\* subject to final audit

	2019/20		2020/21		2021/22		2022/23		2023/24		2024/25	
Parking	10,438	29.6%	6,633	36.6%	6,977	26.5%	7,561	25.2%	9,689	26.2%	10,366	26.9%
Bus Lanes & MT	5,384	15.3%	3,211	17.7%	4,832	18.3%	4,647	15.5%	4,863	13.1%	5,481	14.2%
RUCA	19,477	55.2%	8,272	45.6%	7,869	29.9%	9,476	31.6%	10,752	29.0%	14,440	37.5%
CAZ	0	0.0%	0	0.0%	6,655	25.3%	8,270	27.6%	11,703	31.6%	8,166	21.2%
Other	4	0.0%	6	0.0%	4	0.0%	9	0.0%	31	0.1%	40	0.1%
	35,303	100.0%	18,122	100.0%	26,337	100.0%	29,963	100.0%	37,038	100.0%	38,493	100.0%

## Key points:

- Parking, Bus Lanes and Moving Traffic now account for a smaller proportion of appeals received (26.9% and 14.2% respectively)
- RUCA appeals have similarly seen a drop as a proportion of appeals received 55.2 in 19/20 to 37.5% in 24/25
- CAZ appeals account for 21.2% of appeals received (a drop from 31.6% in 23/24)



## 1.2 2024/25 by month

### PCNs appealed

2024/25										
	Parking Eng	Parking Wales	Bus Lanes	Moving Traffic	Nat Highways	Mersey Gateway	Durham	CAZ	LFV	Month TOTAL
April	785	62	389	22	1,231	116	1	690	0	3,296
May	815	55	421	35	1,763	74	0	687	1	3,851
June	748	48	386	35	1,417	58	3	666	1	3,362
July	891	68	416	58	1,819	148	0	657	5	4,062
August	790	63	315	46	1,515	43	3	690	5	3,470
September	762	64	359	37	1,329	44	0	678	1	3,274
October	817	80	356	99	1,060	89	1	619	4	3,125
November	756	61	402	125	871	42	0	567	3	2,827
December	704	60	358	95	689	55	0	651	6	2,618
January	820	72	367	212	650	85	1	666	1	2,874
February	841	71	337	142	659	54	0	839	2	2,945
March	867	66	318	151	556	73	0	756	2	2,789
<b>TOTAL</b>	<b>9,596</b>	<b>770</b>	<b>4,424</b>	<b>1,057</b>	<b>13,559</b>	<b>881</b>	<b>9</b>	<b>8,166</b>	<b>31</b>	<b>38,493</b>
average	800	64	369	88	1,130	73	1	681	3	3,208
split	24.9%	2.0%	11.5%	2.7%	35.2%	2.3%	0.0%	21.2%	0.1%	100.0%

### Cases

2024/25										
	Parking Eng	Parking Wales	Bus Lanes	Moving Traffic	Nat Highways	Mersey Gateway	Durham	CAZ	LFV	Month TOTAL
April	738	62	316	13	328	60	1	426	0	1,944
May	744	53	361	27	412	40	0	534	1	2,172
June	683	46	344	27	367	32	3	505	1	2,008
July	827	67	355	51	436	55	0	501	5	2,297
August	757	56	270	41	417	30	3	558	5	2,137
September	713	61	332	34	358	31	0	506	1	2,036
October	777	75	322	79	333	43	1	434	4	2,068
November	717	56	348	110	295	30	0	429	3	1,988
December	667	57	298	86	238	36	0	412	6	1,800
January	782	69	340	146	277	44	1	503	1	2,163
February	782	71	299	120	211	40	0	653	1	2,177
March	800	64	284	118	189	30	0	549	2	2,036
<b>TOTAL</b>	<b>8,987</b>	<b>737</b>	<b>3,869</b>	<b>852</b>	<b>3,861</b>	<b>471</b>	<b>9</b>	<b>6,010</b>	<b>30</b>	<b>24,826</b>
average	749	61	322	71	322	39	1	501	3	2,069
split	36.2%	3.0%	15.6%	3.4%	15.6%	1.9%	0.0%	24.2%	0.1%	100.0%
<b>PCN per case (ave)</b>	<b>1.1</b>	<b>1.0</b>	<b>1.1</b>	<b>1.2</b>	<b>3.5</b>	<b>1.9</b>	<b>1.0</b>	<b>1.4</b>	<b>1.0</b>	<b>1.6</b>

### Key points:

- Appeals and PCNs appealed fluctuate each month for several reasons (varying between appeal types)
- Appellants can submit more than one PCN per appeal – this is helpful where the issues are the same
- RUCA appeals are more likely to contain more than one PCN – this is particularly pronounced for Dartcharge (National Highways)
- **Due to operational issues National Highways saw a much higher PCN Issuance and Appeal Numbers in the first part of 24/25, this is now back to average levels**



## 2. Context of PCNs Issued by Enforcement Authorities

The following tables look at the levels of enforcement and PCN issuance, and their relationship to the numbers of PCNs being appealed, between 2019/20 (pre pandemic) and 24/25 post pandemic.

### PCNs Issued

\*\* subject to final audit

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
	PCNs Issued	PCNs Issued	PCNs Issued	PCNs Issued	PCNs Issued	PCNs Issued
Bus Lanes - England	1,913,024	1,230,691	2,163,455	1,994,230	1,984,040	1,913,982
Bus Lanes & MT	73,924	47,470	73,809	82,619	213,414	522,138
Parking - England	4,932,070	3,085,501	4,968,158	5,031,516	5,432,055	6,425,415
Parking - Wales	267,861	136,336	259,239	310,351	351,246	236,516
Dartcharge	2,332,501	1,671,267	2,198,857	2,547,684	2,107,430	3,019,126
Mersey Gateway	630,004	375,841	588,500	597,736	652,923	621,586
CAZ	0	0	838,047	895,027	1,366,108	1,007,202
LFV + Durham	75	159	437	231	1,922	6,577
Total	10,149,459	6,547,265	11,090,502	11,459,394	12,109,138	13,752,542
	0	0	0	0	0	0

Exc CAZ 10,149,459 6,547,265 10,252,455 10,564,367 10,743,030 12,745,340

Exc CAZ and MG 9,519,455 6,171,424 9,663,955 9,966,631 10,090,107 12,123,754

### Rate of Appeal

\*\* subject to final audit

	2019/20			2023/24			2024/25			24/25 to 19/20
	PCNs Issued	PCNs Appealed	Appeal Rate %	PCNs Issued	PCNs Appealed	Appeal Rate %	PCNs Issued	PCNs Appealed	Appeal Rate %	Appeal Rate %
Bus Lanes - England	1,913,024	5,229	0.27%	1,984,040	4,699	0.24%	1,913,982	4,424	0.23%	-0.04%
Bus Lanes & MT	73,924	155	0.21%	213,414	164	0.08%	522,138	1,057	0.20%	-0.01%
Parking - England	4,932,070	9,668	0.20%	5,432,055	8,933	0.16%	6,425,415	9,596	0.15%	-0.05%
Parking - Wales	267,861	770	0.29%	351,246	756	0.22%	236,516	770	0.33%	0.04%
Dartcharge	2,332,501	8,534	0.37%	2,107,430	9,567	0.45%	3,019,126	13,559	0.45%	0.08%
Mersey Gateway	630,004	10,943	1.74%	652,923	1,185	0.18%	621,586	881	0.14%	-1.60%
CAZ	0	0	0.00%	1,366,108	11,703	0.86%	1,007,202	8,166	0.81%	0.81%
LFV + Durham	75	4	5.33%	1,922	31	1.61%	6,577	40	0.61%	-4.73%
Total	10,149,459	35,303	0.35%	12,109,138	37,038	0.31%	13,752,542	38,493	0.28%	-0.07%
	0	0		0	0		0	0		

Exc CAZ 10,149,459 35,303 0.35% 10,743,030 25,335 0.24% 12,745,340 30,327 0.24%

Exc CAZ and MG 9,519,455 24,360 0.26% 10,090,107 24,150 0.24% 12,123,754 29,446 0.24%

	19/20 to 24/25	
	Change in number of PCNs Issued	Change in number of PCNs Appealed
Bus Lanes - England	0.1%	-15.4%
Bus Lanes & MT - Wales	606.3%	581.9%
Parking - England	30.3%	-0.7%
Parking - Wales	-11.7%	0.0%
Dartcharge	29.4%	58.9%
Mersey Gateway	-1.3%	-91.9%
CAZ	0.0%	0.0%
LFV + Durham	8669.3%	900.0%
Total	35.5%	9.0%

Exc CAZ

25.6%	-14.1%
-------	--------

### Key Points:

- The rate of appeal remains relatively static year on year
- However there are appeal types where the trend in PCN issuance is not matched by the trend in the appeals received, An example is Parking England where an increase of 30.3% in PCNs issued compares with a 0.7% drop in appeals received.
- The reduction in rates of appeal would seem to indicate that appeals for PCNs are being resolved at an Enforcement Authority level and therefore not coming to the tribunal.

*Please note:*

*The figures within this section include all PCNs dealt with by the Tribunal. This includes Witness Statements referred to the Adjudicators following debt registration at the Traffic Enforcement Centre at Northampton County Court. The PCN figures will also include a small number of duplicated PCNs and those PCNs not registered by the Adjudicator.*

## 3. Hearings

The tables below show a breakdown of the decision methods over the last few years. These numbers exclude cases closed by No Contest which make up around 32% of cases closed.

	Cases requiring a Decision				
	TOTAL	F2F	Video + Tel	E-decision	
2025/26	1,407	0	283	1,124	<i>part year</i>
2024/25	16,069	0	3,389	12,680	<i>full year</i>
2023/24	14,656	0	3,372	11,284	<i>full year</i>
2022/23	11,167	0	2,348	8,819	<i>full year</i>
2021/22	9,258	0	1,919	7,339	<i>full year</i>
2020/21	7,405	0	1,210	6,195	<i>full year</i>
2019/20	15,365	6	3,706	11,653	<i>full year</i>
2018/19	13,818	14	3,099	10,705	<i>full year</i>
2017/18	11,134	596	1,924	8,614	<i>full year</i>

	Cases requiring a Decision				
	TOTAL	F2F	Video + Tel	E-decision	
2025/26	100.0%	0.0%	20.1%	79.9%	<i>part year</i>
2024/25	100.0%	0.0%	21.1%	78.9%	<i>full year</i>
2022/23	100.0%	0.0%	21.0%	79.0%	<i>full year</i>
2021/22	100.0%	0.0%	20.7%	79.3%	<i>full year</i>
2020/21	100.0%	0.0%	16.3%	83.7%	<i>full year</i>
2019/20	100.0%	0.0%	24.1%	75.8%	<i>full year</i>
2018/19	100.0%	0.1%	22.4%	77.5%	<i>full year</i>
2017/18	100.0%	5.4%	17.3%	77.4%	<i>full year</i>

2024/25					
	Video+ Tel	F2F	E-D	No Contest	Month TOTAL
April	287	0	951	639	1,877
May	241	0	1,000	659	1,900
June	214	0	1,056	611	1,881
July	247	0	1,129	664	2,040
August	209	0	1,100	592	1,901
September	262	0	1,052	574	1,888
October	262	0	1,141	585	1,988
November	336	0	977	558	1,871
December	324	0	894	482	1,700
January	382	0	1,002	643	2,027
February	318	0	1,087	493	1,898
March	307	0	1,291	521	2,119
TOTAL	3,389	0	12,680	7,021	23,090

14.7%      0.0%      54.9%      30.4%      100.0%

## 4. Proxy cases

For the small percentage of people who do find it initially difficult to go online, the TPT provides 'Assisted Digital' support. Assisted Digital is an active form of engagement with appellants to 'walk

through' the online appeal submission process and / or complete it on their behalf (by 'proxy'). Contact with the TPT team remains available throughout the process should it be required.

The average number of cases dealt with by proxy per month is currently just **4.6% for the 12 months 2024/25**.

## 4. Case closure and Status

Appealing to the Traffic Penalty Tribunal is a judicial process, and while it is not appropriate to set rigid timescales, the TPT's objective is to provide a Tribunal service that is user focused, efficient, timely, helpful and readily accessible. Case resolution times provide a window on the efficiency and usability of the online appeals system, as well as the associated improved business processes.

At 20<sup>th</sup> May 2025 there were 1,454 PCNs that were awaiting a decision.

### Decisions Outstanding as at 20/05/2025

Authority	Number PCNs
Dartcharge	450
Bradford CAZ	104
Birmingham CAZ	99
Brighton & Hove Parking	34
Sheffield CAZ	25
< 25 PCNs per LA	742

*note: does NOT include WS/SD*

**1,454**

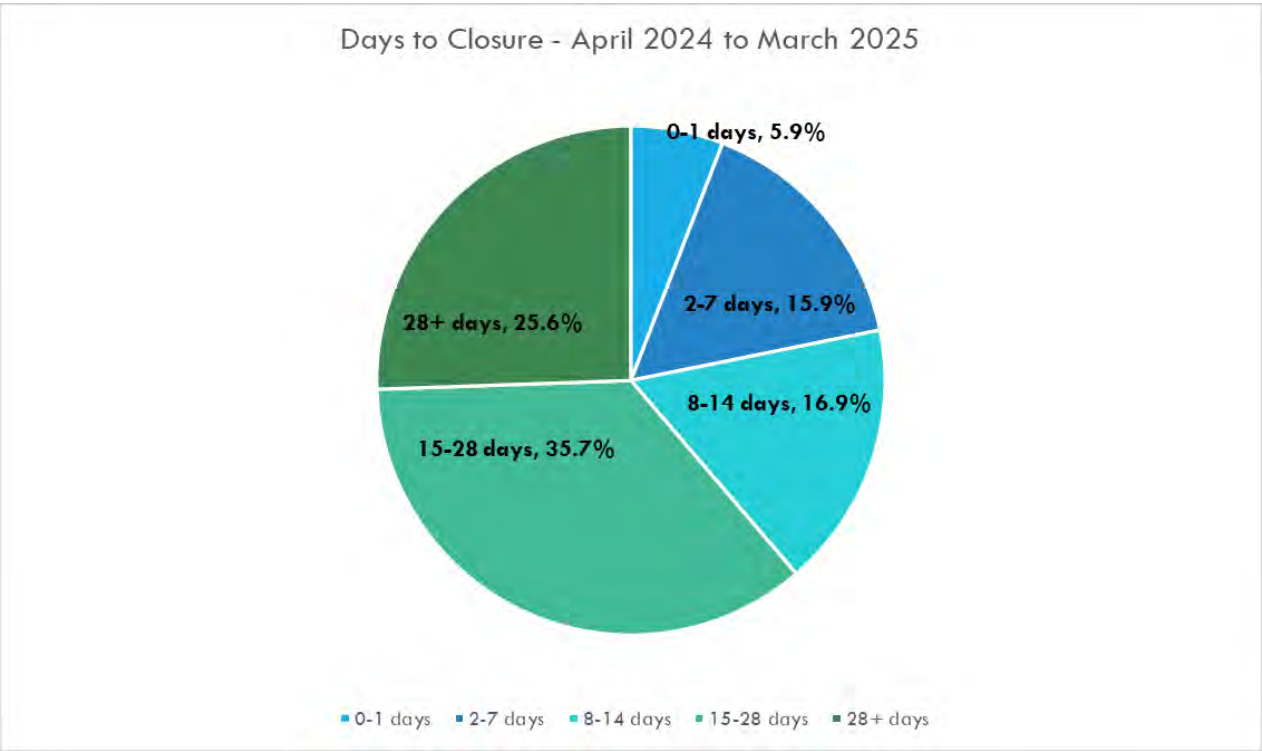
The data below shows appeal case closure times for cases closed between April 2024 and March 2025.

April 2024 to March 2025

Case Closure	
0-1 days	5.9%
2-7 days	15.9%
8-14 days	16.9%
15-28 days	35.7%
28+ days	25.6%

Case Closure	
5.9%	0-1 day
21.8%	Less than 7 days
38.7%	Less than 14 days
74.5%	Less than 28 days
25.6%	More than 29 days

100%



## 4. Case closure by Outcome

	Allow.	CO	Dis.	Mults.	No Cont.	Reg Rej.	With.	WS - Can.	WS - Enf.	TOTAL
<b>0-1 days</b>	7	26	2	8	691	387	59	6	72	<b>1,258</b>
	0.6%	2.1%	0.2%	0.6%	54.9%	30.8%	4.7%	0.5%	5.7%	100.0%
<b>2-7 days</b>	44	399	124	385	2,067	499	102	11	106	<b>3,737</b>
	1.2%	10.7%	3.3%	10.3%	55.3%	13.4%	2.7%	0.3%	2.8%	100.0%
<b>8-14 days</b>	136	386	732	380	1,471	179	67	50	125	<b>3,526</b>
	3.9%	10.9%	20.8%	10.8%	41.7%	5.1%	1.9%	1.4%	3.5%	100.0%
<b>15-28 days</b>	742	438	2,548	741	566	34	31	130	1,521	<b>6,751</b>
	11.0%	6.5%	37.7%	11.0%	8.4%	0.5%	0.5%	1.9%	22.5%	100.0%
<b>29-49 days</b>	604	129	1,946	348	21	8	5	25	129	<b>3,215</b>
	18.8%	4.0%	60.5%	10.8%	0.7%	0.2%	0.2%	0.8%	4.0%	100.0%
<b>50+ days</b>	184	52	449	152	2	3	0	6	19	<b>867</b>
	21.2%	6.0%	51.8%	17.5%	0.2%	0.3%	0.0%	0.7%	2.2%	100.0%
	<b>1,717</b>	<b>1,430</b>	<b>5,801</b>	<b>2,014</b>	<b>4,818</b>	<b>1,110</b>	<b>264</b>	<b>228</b>	<b>1,972</b>	<b>19,354</b>

### Key Points:

- The majority of cases closed within a day are closed via No Contest (54.9%) or Registration Rejected (30.8%). A similar pattern is seen for 2-7 days.
- Beyond 14 days, the majority of cases closed are Disallowed (37.7%, 60.5% and 51.8%)
- The majority of Allowed cases take 50+ days to close (21.2%)
- The majority of Dismissed cases are closed between 29 and 49 days (60.5%)





**Traffic Penalty  
Tribunal**  
England and Wales

# Annual Report 2024–25



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## Background

**The Traffic Penalty Tribunal (TPT) decides motorists' appeals against penalty charge notices (PCNs), issued by local authorities and charging authorities in England (outside London) and Wales, for traffic contraventions.**

This includes appeals against PCNs issued by over 300 local authorities in England and Wales for **parking, bus lane** and **moving traffic** contraventions, as well as for **Clean Air Zones** and **littering from vehicles** (England only).

The TPT also decides appeals against penalties from other road user charging schemes in England, including the Dartford-Thurrock River Crossing ('**Dart Charge**') and the Mersey Gateway and Silver Jubilee Bridge Crossings ('**Merseyflow**').

Appeals to the TPT are decided by 24 part-time Adjudicators, together with the Chief Adjudicator, Caroline Hamilton. All the adjudicators are wholly independent lawyers, whose appointments are subject to the Lord Chancellor's consent. They are supported by a team of administrative staff.

The independent TPT is funded by a Joint Committee of the 300+ authorities that enforce the traffic restrictions: **Parking and Traffic Regulations Outside London (PATROL)**. These authorities are fulfilling a statutory duty to make provision for independent adjudication against the civil enforcement penalties they issue.

- The TPT decides appeals against ~25,000 PCNs each year.
- Most appeals are completed fully online, with attendance hearings (via telephone or video) also available.
- Appellants unable to get online receive Assisted Digital support by phone, Live Chat or post for appeals to be completed 'by proxy'.
- 40% of cases are completed within 14 days, with >75% within 28 days.





## Chief Adjudicator's Foreword

Caroline Hamilton

I am pleased to present the adjudicators' annual report to the statutory PATROL Joint Committee. The report not only delivers a transparent insight into the work of the Tribunal, but it also provides all stakeholders with a broader understanding of the law and its application in the determination of fixed penalty appeals under the civil statutory schemes within our jurisdiction.

In the reporting year, the independent adjudicators have continued to deliver efficient and proportionate justice, with cases addressed without delay, supported by our automated case management system, 'FOAM' (Fast Online Appeals Management), providing our users with ready and easy access to the Tribunal. This paperless system allows appellants to lodge appeals, providing the parties with an efficient means of making representations, uploading evidence, as well as viewing and commenting on evidence submitted by the opposing party.

Such an automated appeals portal supports the core principles of the Tribunal, facilitating access to justice, transparent evidence sharing and the delivery of prompt outcomes.

The Tribunal remains committed to supporting those unable to access the online system by providing the necessary administrative assistance. Anticipating such needs ensures that the Tribunal and access to justice remains available to all (see Page 9 of the report).

This reporting year saw a small increase in appeals. The adjudicators have successfully managed the higher volume without delay or a backlog of cases. The case volumes and outcomes can be seen from Page 6.

The Tribunal-curated key cases website, **Traff-iCase** (<https://www.keycases.info/>) is now firmly established, with links available to users via the Tribunal's website and the FOAM online appeals system. The ultimate aim of this key cases website is to collate appeal determinations that clarify the law and illustrate obligations, leading to reductions in both the number of unwitting contraventions and appeals without merit. The key case reports featured on the *Traff-iCase* site provide our users with access to clear and straightforward information, allowing for a fuller understanding of their rights and responsibilities.

Councils are encouraged to include the URL to the *Traff-iCase* website in their correspondence to motorists. This would allow motorists who are unwilling to accept the council's application or assessment of the law as detailed in a formal Notice of Rejection of Representations document to research and consider the law independently for themselves.

### Training

The adjudicators annual training conference took place in Birmingham on 26 November 2024. The adjudicators all work remotely using the FOAM case management system. The training meeting allows the adjudicators (who determine appeals independently) to meet, share their knowledge and discuss best practice, as well as any challenging or unusual issues that may have arisen during the reporting year. Further details of this training meeting can be found at Page 21 of this report.

Having maintained our obligation to deliver timely, user-friendly access to justice during the course of the reporting year, the adjudicators are pleased to present this 2024-2025 report to the Joint Committee.

**Caroline Hamilton**  
**April 2025**



# 1. Workload

## 1.1 New schemes

**The jurisdiction of the adjudicators at the Traffic Penalty Tribunal continued to increase in the reporting year, with more local authorities commencing enforcement for moving traffic, bus lane and littering from vehicles contraventions.**

### Clean Air Zones

The adjudicators determine appeals from zones in Bath, Birmingham, Bradford, Bristol, Newcastle/Gateshead, Oxford (Zero Emission Zone), Portsmouth and Sheffield. There are four types of Clean Air Zones:



**A:** Applying to buses, coaches, taxis and private hire vehicles (PHVs).

**B:** Applying to buses, coaches, taxis, PHVs and heavy goods vehicles (HGVs).

**C:** Applying to buses, coaches, taxis, PHVs, HGVs, vans and minibuses.

**D:** Applying to buses, coaches, taxis, PHVs, HGVs, vans and minibuses, as well as private cars (also an option to include motorcycles).

All current zones fall under types B–D. The schemes are self-declaratory, the responsibility resting with the motorist to check their vehicle's status to establish whether a charge is due. A vehicle's status can be checked and further information found at: <https://www.gov.uk/clean-air-zones>.

### Moving traffic and bus lanes



Moving traffic enforcement has extended in the reporting year with the following authority areas currently exercising civil enforcement powers: Bristol, Buckinghamshire, Cambridgeshire, Central Bedfordshire, Cheshire West and Chester, Coventry, Derby, Durham, Gloucestershire, Hampshire, Hertfordshire, Kent, Leeds, Leicester, Liverpool, Luton, Manchester, Medway, Norfolk, North Northamptonshire, Nottingham, Nottinghamshire, Oldham, Oxfordshire, Peterborough, Reading, Rotherham, Royal Borough of Windsor and Maidenhead, Shropshire, South Gloucestershire, Southampton, Stoke-on-Trent, Surrey, Thurrock, Trafford, Walsall, West Berkshire, West Northamptonshire, Wigan and Wokingham,

A further 26 councils have been awarded moving traffic enforcement powers and will progress to live enforcement in the coming months.

Additionally, bus lane contraventions are now enforced under the civil scheme by the following authority areas this year: Adur & Worthing, Blackpool, Bolton, Hampshire, Norfolk, North Somerset, South Cambridgeshire and Watford.



## Road User Charging

The Tribunal determines appeals arising from penalty charge notices (PCNs) issued to vehicles having failed to pay for use of a number of road user charging schemes.

### *Dart Charge*



Appeals relating to PCNs issued to vehicles having failed to pay the crossing charges that apply at the Queen Elizabeth II Bridge and through the Dartford Tunnels, which cross the River Thames between Dartford, Kent, and Thurrock, Essex. The charging authority and respondent to an appeal is the Secretary of State for Transport.

### *Merseyflow*



Appeals relating to PCNs issued to vehicles having failed to pay the crossing charges that apply for travel across both the Mersey Gateway and Silver Jubilee Bridges, which cross the River Mersey between Runcorn and Widnes, Cheshire. The charging authority is Halton Borough Council.

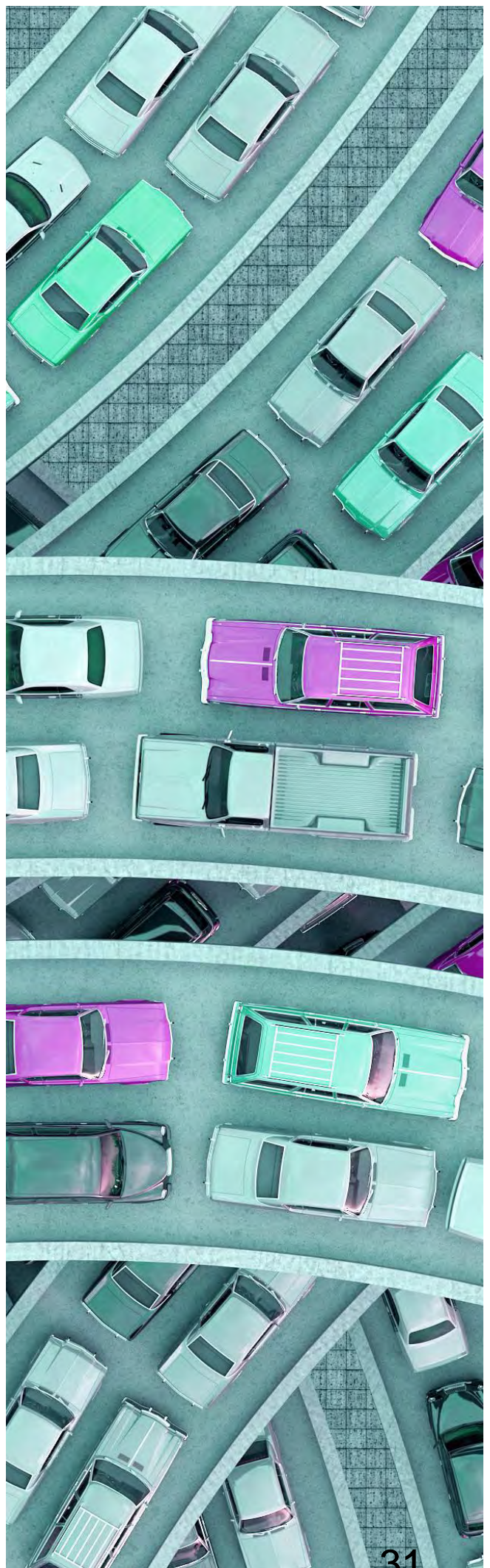
### *Durham Road User Charge Zone*

Appeals relating to non-payment for entry into the Durham City Centre Peninsula. The charging authority is Durham County Council.

### **Littering from vehicles**



The Tribunal also determines appeals relating to penalty notices issued under the civil littering from vehicles regulations, currently enforced in: Blackburn with Darwen, Bradford, Canterbury, Charnwood, Cumberland, Dover, Dorset, Hartlepool, Leicester, Manchester, Mid Devon, Milton Keynes, Mole Valley, Newcastle, North West Leicester, South Gloucestershire, Stroud, Sunderland, Teignbridge, Telford & Wrekin, Wigan and Wychavon,



## 1.2 Appeal volumes and outcomes

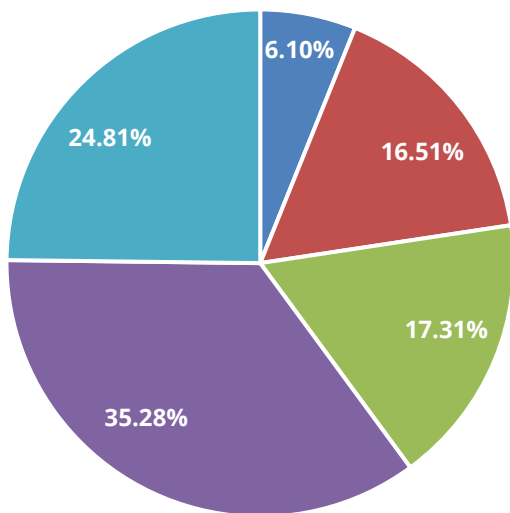
This reporting year has seen a small increase in the number of appeals received, with more council authorities adopting available powers to enforce moving traffic contraventions using government-approved traffic enforcement cameras.

In contrast, as expected, the number of Clean Air Zone appeals has decreased, reflecting motorists' growing knowledge and understanding of these zones, including familiarity with the 'green cloud' symbol, now included in the Department for Transport's *Know your traffic signs* publication <https://www.gov.uk/government/publications/know-your-traffic-signs>.

### Total appeals, 2024-25 (previous year shown in brackets)

- Appeals registered by adjudicator: 22,295 (22,176)
  - Statutory Declarations / Witness Statements: 2,668 (2,226) – concerning 3,236 PCNs
  - Appeals determined: 21,780 (25,649)
  - Appeals allowed: 7,789 (10,428), of which 5,465 (7,545) were not contested
  - Appeals refused: 8,570 (7,519), of which 245 (197) were withdrawn
- TOTAL: 24,963 (24,402)**

**Chart: Case closure at the Tribunal 2024-25**  
(% of cases against number of days open)



- 0-1 Day
- 2-7 Days
- 8-14 Days
- 15-28 Days
- 29+ Days

### A note on the data

The statistics provided detail the number of appeals received and registered at the Tribunal. Some appeals will have been registered, but not yet determined when this report was prepared. Some determined appeals also contain more than one PCN, creating a perceived discrepancy in our figures.

The Tribunal does not have a backlog of cases as evidenced by the chart left. Appeals may be re-scheduled or adjourned to allow a party to obtain further evidence (such as DVLA correspondence), but it is generally not proportionate to delay the outcome of an appeal for a considerable period.

## Appeals process

Appeals can only be registered at the Tribunal when the requirements of Part 2 of Schedule 1 to *The Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022* (the '2022 Appeals Regulations') or Part 2 of *The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013* (the '2013 RUC Regulations') – applying to littering from vehicles, as well as road user charging – and in Wales, *The Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (Wales) Regulations 2013* (the '2013 Welsh Regulations') are met.

Appeals made at the wrong time, from the wrong person or without adequate information may be rejected. The adjudicators exercise a judicial function, determining appeals by assessing the evidence, making findings of fact and applying the law. The jurisdiction of the adjudicators is limited to the statutory grounds of appeal and the adjudicators do not have the power to take mitigating circumstances into account. This has been confirmed by the Court of Appeal (see: <https://www.keycases.info/issues/mitigating-circumstances/page/3/>).

The fixed penalty scheme does not take degrees of culpability into account. This means that a motorist who had no intention of driving or parking in contravention will remain liable to the council authority for a civil penalty.

In 2024-25, **1,339** (1,247 previous year) **appeals were received at the Tribunal that due to a deficiency were not registered** by the Proper Officer or independent adjudicator. If an appeal is rejected, the prospective appellant is provided with reasons, allowing them to correct any failures or provide further information allowing the registration of the appeal to be re-assessed.

The registration of an appeal is an ongoing period of review for the respondent authorities. Some appeals are submitted with supporting evidence that was not provided to the authority at the representation stage (e.g. evidence of sale or hire, medical evidence or bank statements).

This evidence will be considered by the authority and, if satisfactory, an appeal will not be contested by that authority and the penalty cancelled. Having considered the grounds of appeal, the respondent authority may also exercise a discretion in the motorist's favour by offering to accept a reduced penalty amount for a further period or indicating that it is willing to accept a late road user charge.

Appellants are also able to withdraw a registered appeal before its determination. This can arise when evidence submitted by the council is viewed further or more closely (in particular, CCTV recordings that the motorist may not have accessed on the council's website, and CCTV evidence showing the location, signs and markings in place). Once withdrawn, the appellant has 14 days to settle the penalty amount.

Consent Orders can also be achieved via the appeals portal. Adjudicators may seek clarification on an issue or provide a party with details of established case law that may result in a better understanding and a compromise of proceedings before the appeal is determined by the adjudicator. **1,670** (1,830 previous year) **Consent Orders** were issued in the reporting year.

## Referrals from the County Court

Orders issued by the Traffic Enforcement Centre are referred to the adjudicator under Regulation 23 of *The Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) Regulations 2022* (the '2022 Enforcement Regulations') or Regulation 19 of the 2013 RUC Regulations and the 2013 Welsh Regulations.

**The Order of the County Court does not cancel the penalty charge notice or a motorist's liability to a charging authority for a road user charge.** On receipt of the referral, the adjudicator will determine whether a statutory right of appeal has been established or whether a direction, including a payment direction should be issued. **1,624** (1,492 previous year) **payment directions** were made further to the referral of an Order issued by the Traffic Enforcement Centre in the reporting year.



The individual appeal types (parking, bus lane, moving traffic, Clean Air Zones, road user charging and littering from vehicles) had the following numbers and outcomes (previous year shown in brackets).

## Parking



**Appeals received: 8,300 (7,655). Decided: 7,482**

<b>Appeals allowed:</b>	<b>3,363</b> (3,429), inc. 1,892 (1,863) not contested
<b>Appeals refused:</b>	<b>4,119</b> (3,440), inc. 65 (45) withdrawn

## Bus Lane



**Appeals received: 3,380 (3,704). Decided: 4,100**

<b>Appeals allowed:</b>	<b>2,555</b> (1,592), inc. 963 (1,071) not contested
<b>Appeals refused:</b>	<b>1,545</b> (1,596), inc. 36 (57) withdrawn

## Moving Traffic



**Appeals received: 763 (129). Decided: 662**

<b>Appeals allowed:</b>	<b>247</b> (54), inc. 161 (41) not contested
<b>Appeals refused:</b>	<b>415</b> (67), inc. 8 (3) withdrawn

## Clean Air Zone



**Appeals received: 4,947 (7,806). Decided: 3,986**

<b>Appeals allowed:</b>	<b>1,681</b> (3,865), inc. 1,337 (3,159) not contested
<b>Appeals refused:</b>	<b>2,305</b> (2,244), inc. 65 (66) withdrawn

## Dart Charge



**Appeals received: 3,879 (3,361). Decided: 922**

<b>Appeals allowed:</b>	<b>788</b> (1,063), inc. 754 (1,025) not contested
<b>Appeals refused:</b>	<b>134</b> (66), inc. <b>61</b> (28) withdrawn

## Merseyflow



**Appeals received: 474 (738). Decided: 390**

<b>Appeals allowed:</b>	<b>363</b> (408), inc. 353 (380) not contested
<b>Appeals refused:</b>	<b>27</b> (95), inc. <b>9</b> (4) withdrawn

## Durham RUC\* Zone



**Appeals received: 10 (5). Decided: 10**

<b>Appeals allowed:</b>	<b>2</b> (2), inc. <b>1</b> (2) not contested
<b>Appeals refused:</b>	<b>8</b> (2), inc. <b>0</b> (0) withdrawn

## Littering from Vehicles



**Appeals received: 27 (25). Decided: 25**

<b>Appeals allowed:</b>	<b>8</b> (15), inc. <b>4</b> (4) not contested
<b>Appeals refused:</b>	<b>17</b> (9), inc. <b>1</b> (0) withdrawn

\* RUC: Road User Charge

## 1.3 Method of decisions

### The automated case management system

The Tribunal's ability to provide a reliable, accessible online portal ('Fast Online Appeals Management [FOAM]') and remote hearings continues to deliver efficient, effective access to justice to our users. This allows for a timely, proportionate resolution of the civil penalty appeals currently under the jurisdiction of the adjudicators.

The user-friendly digital platform has been embraced by Tribunal users, but the adjudicators recognise some motorists are unable to use an online system, therefore appeals may be lodged by post or email. This remains an option and 4.63% (4.15%) of appeals were lodged in this way. On receipt of appeal correspondence, the Tribunal's administrative team creates an appeal on the case management system, allowing the council authorities to access the appeal via the portal in the usual way, but with all communications sent by post or email to the appellant.

### Types of hearing

Once the appeal is registered and the council has confirmed that the appeal will be contested, the parties are provided with an opportunity to select a preferred hearing type. Postal decisions ('e-Decisions') are determined on the evidence submitted by the parties without the need to give oral evidence or attend a hearing. The adjudicator, having considered the evidence submitted by the parties, provides full written reasons for the decision reached.

#### Postal / e-Decisions:

**12,681 in reporting year** (11,286 in 2023–24). Parties to the appeal may prefer to present evidence orally. This can be efficiently and justly achieved by attendance at a hearing by telephone or via a video platform. The adjudicator is responsible for managing the hearings and, under the 2022 Appeal Regulations, the 2013 Welsh Regulations and the 2013 RUC Regulations, the adjudicator must conduct proceedings '*...in the manner most suitable to the clarification of the issues and generally to the just handing of the proceedings...*' The various regulations also provide the adjudicator with the power to require the attendance of '*any person including a party to the appeal.*'

#### Personal hearings:

**3,283 in reporting year** (3,321 in 2023–24):

**2,146** (2,230): phone; **1,137** (1,091): video.

Full written reasons for the decision reached are provided to the parties, even if the decision is given orally at the end of the hearing.

## 1.4 Costs

The 2022 Appeal Regulations, the 2013 Welsh Regulations and the 2013 RUC Regulations state:

- (1) An adjudicator must not normally make an order awarding costs and expenses.
- (2) But, subject to sub-paragraph (3), an adjudicator may make an order awarding costs and expenses—
  - (a) against a party (including an appellant who has withdrawn an appeal or an enforcement authority which has consented to an appeal being allowed), if the adjudicator considers that—(i) the party has acted frivolously or vexatiously, or
  - (ii) the party's conduct in making, pursuing or resisting an appeal was wholly unreasonable;
  - (b) against an enforcement authority, where the adjudicator considers that the disputed decision was wholly unreasonable.
- (3) An order must not be made against a party unless that party has been given an opportunity to make representations against the making of the order.
- (4) An order must require the party against whom it is made to pay to the other party a specified sum in respect of the costs and expenses incurred by that other party in connection with the proceedings.

The recipient of the Notice of Rejection of Representations served by an authority has a statutory right of appeal to the independent adjudicator and no issuing fee applies. Costs can, however, be awarded if either party acts in a way that is considered by the adjudicator to be frivolous, vexatious or wholly unreasonable. This is a high threshold of improper conduct to reach and, under the regulations, costs are not the norm.

Costs can reflect only expenses that have actually been incurred at appeal. There is no power to make an award of compensation. The limited number of applications and subsequent Orders reflects the Tribunal's regulations and the adjudicator's limited jurisdiction.

#### Applications for costs (2024–25)

*Previous year in brackets*

	Appellant	Authority	TOTAL
<b>Costs applications made</b>	96 (120)	4 (1)	<b>99 (121)</b>
<b>Costs awarded</b>	2 (1)	4 (1)	<b>6 (2)</b>



## 2. Judicial Review

The statutory appeal process is expected to be final, with limited grounds for review provided to the parties under the regulations. The judicial review case: **R (on the application of Transport for London) v London Tribunals (Environment and Traffic Adjudicators) and Commercial Plant Services [2023] EWHC 2889 (Admin)** clarifies that the grounds for review do not include an application made referencing an error of law. These are for the High Court.

Should a party seek to contest the outcome of an appeal, the remedy at law lies in an application to the High Court for the judicial review of the decision challenged. It is the High Court that oversees the work of the adjudicators, who remain the expert tribunal. Judicial review in turn allows a decision of the tribunal to be challenged on only three grounds:

1. The decision is unlawful, that it is a decision the adjudicator was not entitled to make.
2. The decision is a decision that no reasonable tribunal would have made in the circumstances; or
3. The decision has been made in a procedurally unfair manner.

The High Court Judge will review the lawfulness of the decision and may uphold it, quash it or return a case to the adjudicator for a re-determination. Decisions of the High Court are in turn appealable on a point of law to the Court of Appeal (and beyond). Judgments of the Courts provide clarity and furnish the adjudicators (and our users) with the correct and definite interpretation of the law and regulations, allowing for consistent application and decision making. This in turn allows motorists and councils to have a clear understanding of their respective obligations, rights and responsibilities.

**This reporting year saw a number of judicial review applications and outcomes.**

### 2.1 Outcomes – permission granted

*No application received permission to proceed to judicial review in this reporting year.*

### 2.2 Applications – permission refused

**The King on the application of Nsimba Dasilva v The Traffic Penalty Tribunal Adjudicator and Birmingham City Council (interested party) AC-2024-BHM00124**  
**Nsimba Da Silva v Birmingham City Council (TPT KW05237-2312)**

#### **The appeal decision**

The late appeal was not registered, no reason for the delay having been provided by Mr Da Silva.



## The application for review

The reviewing adjudicator identified no ground for review or proper reason for registering the late appeal.

## The application for judicial review

The Court identified no procedural unfairness, noting that not understanding the tribunal procedure is not a basis upon which it is even arguable that the defendant to the application (the adjudicator) acted procedurally unfairly by not extending time limits for appeal.

*The King (on the application of Lewis and Galaxy Travel) v The Adjudicator and Sheffield City Council (AC/2024-LDS-000166)*

*Lewis v Sheffield City Council TPT FD00290-2403*

## The appeal decision

The eight linked appeals were refused by the independent adjudicator for the following reasons:

1. *Mr Lewis attended to represent Gemma Thompson and Galaxy Travel and to make submissions in his own appeal in these 8 linked cases.*
2. *Mr Quinn attended on behalf of the council authority.*
3. *In each case, the vehicle was being driven under a written agreement that the appellants contend transferred liability to the council authority for Clean Air penalty charge notices from the registered keeper to the driver of the vehicle.*
4. *I have considered each penalty charge notice and the individual agreement relied on noting as follows:*

*FD00290-2403:*

*The vehicle was observed within the Clean Air Zone on 14th November 2023. No payment was made.*

*The hire agreement relied on is dated 7th November 2023. Under "hire agreement and length of contract" the agreement states "TBC from start date". The hire vehicle is not identified.*

*FD00289-2403*

*The vehicle was observed within the Clean Air Zone on 7th November 2023. No payment was made.*

*The hire agreement relied on is dated 2nd November 2021. Under "hire agreement and length of contract" the agreement states "TBC from start date". The hire vehicle is not identified.*

*FD00288-2403*

*The vehicle was observed within the Clean Air Zone on 7th November 2023. No payment was made.*

*The hire agreement relied on is dated 8th August 2023. Under "hire agreement and length of contract" the agreement states "TBC from start date". The hire vehicle is not identified.*

*FD00287-2403*

*The vehicle was observed within the Clean Air Zone on 17th November 2023. No payment was made.*

*The hire agreement relied on is dated 1st November 2023. The date has been altered. The original start date is 10th December 2023 (the year has not been included but the agreement was signed in 2023). The alteration made to the date has not been countersigned. Under "hire agreement and length of contract" the agreement states "TBC from start date". The hire vehicle is not identified.*

*FD00286-2403*

*The vehicle was observed within the Clean Air Zone on 11th November 2023. No payment was made.*

*The hire agreement relied on is dated 1st November 2023. The date has been altered. The original start date is 10th December 2023 (the year has not been included but the agreement was signed in 2023). The alteration to the date has not been countersigned. Under "hire agreement and length of contract" the agreement states "TBC from start date". The hire vehicle is not identified.*

*FD00285-2403*

*The vehicle was observed within the Clean Air Zone on 6th April 2023. No payment was made.*

*The hire agreement relied on is dated 20th October 2020. Under "hire agreement and length of contract" the agreement states "To be continued from start date". The hire vehicle is not identified.*

*FD00284-2403*

*The vehicle was observed within the Clean Air Zone on 4th December 2023. No payment was made.*

*The hire agreement relied on is dated 12th December 2022. Under "hire agreement and length of contract" the agreement states "TBC from start date". The hire vehicle is not identified.*

*FD00283-2403*

*The vehicle was observed within the Clean Air Zone on 21st July 2023. No payment was made.*

*The hire agreement relied on is dated 10th April 2023. Under "hire agreement and length of contract" the agreement states "Continued from start date". The hire vehicle is not identified.*

- 5. Under The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013, a penalty charge notice is to be paid by the registered keeper of the vehicle. If the vehicle is hired, the regulations provide that the vehicle must be hired by a vehicle hire firm and the relevant vehicle must be hired under a hire agreement with a copy of the hiring agreement provided to the charging authority.*
- 6. The hire agreement must contain the name and address of the hirer and a statement of liability. The regulations further provide (Reg 6(7) (c)) that a "hiring agreement" and "vehicle hire firm" have the same meaning as in section 66 of the Road Traffic Offenders Act 1988. This requirement was amended under The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) (Amendment) Regulations 2014, with reference to Section 13(6) of Schedule 4 to the Protection of Freedoms Act 2012. This amendment allowed those "engaged in the hiring of vehicles in the course of business" to let a vehicle to the hirer for "a period of any duration..."*
- 7. The purpose of the regulations is to allow registered keepers to transfer liability for penalties and charges to a hirer. The question in these linked cases is whether the information provided in the hire agreements relied on by each appellant complies with the regulations and is sufficient for the charging authority to issue the Notice to Owner to the hirer of the vehicle and whether on receipt of that notice, the recipient could properly argue that they were not in fact the hirer of the relevant vehicle.*
- 8. The agreements relied on do not identify the vehicle hired under the contract. This is a crucial part of any hire agreement.*
- 9. Mr Lewis explains that this is because the drivers may use any vehicle from a fleet of 25 vehicles. Mr Lewis states that the actual vehicle in use by any driver on a particular date can be identified, because the driver is required to log into a digital despatch. This login identifies the driver and the vehicle.*
- 10. I accept that Mr Lewis is able to identify which driver was using an individual vehicle. The vehicle's details do not however form part of the hire agreement and in such circumstances, without this fundamental information having been included in the signed agreement, I cannot be*

*satisfied that the agreements successfully transfer liability to the council for the penalty charge notices from the appellant registered keepers, to the individuals named in the agreements provided.*

- 11. This does not mean that the appellants have no recourse against their individual drivers, but it does mean that the hire agreements provided do not divest the registered keepers of their responsibility to the charging authority council for civil penalty charge notices.*
- 12. That each appellant believed that the relevant driver would be responsible to the council for payment of the charge and any subsequent penalty is acknowledged, but this is mitigation that cannot amount to a ground of appeal under the statutory fixed penalty scheme. The adjudicator has no power to take such mitigation into account.*
- 13. At the hearing Mr Quinn confirmed that the council sought the zone charges and full penalty amounts regarding each penalty charge notice and I have no power to interfere in this discretionary decision.*
- 14. Mr Lewis makes further general representations stating that on visiting the government website to make a payment drivers are often advised that no payment is due. No evidence linking this issue to these particular penalties has been provided and I am not satisfied that this occurred on any of the occasions relating to the listed penalties.*
- 15. Mr Lewis also states that on occasion, the penalty charge notice is not received. Again, no evidence relating to these individual penalties has been provided. If a postal penalty is not received, the remedy is to make a declaration to the Traffic Enforcement Centre.*
- 16. The appeals are each refused.*
- 17. The council authority remains entitled to enforce the penalties and charges against the identified appellant."*

### **The application for review**

The reviewing adjudicator identified no ground for review.

### **The application for judicial review**

The Court considered that the application of the facts and the regulations was reasonable and rational. The reviewing adjudicator's conclusion that there was no legal basis for review was also reasonable.

**The King on the application of James MacDonald v The Adjudicator and Slough Borough Council (interested party) AC-2024-LON-001173**  
**James MacDonald v Slough Borough Council (TPT SB00012-2402)**

### **The appeal decision**

The appeal was refused by the independent adjudicator for the following reasons:

"

- 1. The Appellant is appealing a Penalty Charge Notice issued in respect of parking on a restricted street during prescribed hours at the location.*
- 2. The Appellant has attended today via Teams as has the Council's representative.*
- 3. The Enforcement Authority relies upon the contemporaneous evidence of the Civil Enforcement Officer, a copy of the PCN and a copy of the relevant legislation.*
- 4. The Appellant contends that he was not parked at the location and that the PCN does not properly reflect the contravention alleged. He contends that in order to be parked, a vehicle must be unattended.*
- 5. I have carefully considered all the evidence in this matter.*
- 6. The photographic evidence of the CEO shows the vehicle to be stationary on double yellow lines at*

*the location. The CEO notes an observation time of some ten minutes. The yellow lines are clearly visible.*

- 7. The prohibition on parking/waiting on double yellow lines extends from the centre of the carriageway to the boundary line. A vehicle may not park on either side of the lines. This is set out within the Order creating this restriction (Enclosure 22) at Article 2 (1) which sets out that the restriction applies to not only the "length of road" but also to the "side of road".*
- 8. The Appellant contends that he needed to stop at the location in order to deal with a phone call. He has hearing difficulties and understandably could not deal with this whilst driving. He has been frank in telling me that his vehicle was stationary at the location for the best part of an hour. He saw a building site nearby and assumed that the land upon which he parked was private property.*
- 9. The council has confirmed that the land in question falls within the Council's remit for parking enforcement. There is no evidence before me to rebut this and I find that the Council was permitted to enforce restrictions at the location.*
- 10. The Appellant contends that he was not "parked" at the location, despite the length of time that he was there, as in order to be parked, the driver must have left the vehicle. He contends that this principle was established in the case of Ashby v Tolhurst. He contends that, if a vehicle is attended, it can be moved upon the request of a CEO.*
- 11. However I reject this argument. In Ashby v Tolhurst, a case decided in the Court of Appeal in 1937, Lord Greene stated simply that "parking your car means, I should have thought, leaving your car in a particular place". There is no specific analysis of whether it is attended or unattended. I find that it cannot be the case that a vehicle which is stationary at a location for a lengthy period of time is not parked, if the driver remains inside it. I am satisfied that the Appellant's vehicle was parked at the location - on the Appellant's own admission, it remained stationary for around an hour, with him inside it, and I find that this amounts to more than "waiting" at the location.*
- 12. The Appellant further contends that the PCN does not set out the nature of the allegation sufficiently accurately, as it contends that the vehicle was parked, as opposed to "waiting".*
- 13. I reject this argument. A PCN must indicate to a driver the nature of the allegation made. A contravention code 1 is used for vehicles which wait/park on yellow lines. The Highway Code makes it clear that double yellow lines indicate "no waiting" at any time. I find that a driver who receives such a PCN would be in no doubt as to the allegation being made. I find that the PCN sufficiently set out the nature of the alleged contravention.*
- 14. The Appellant contends that the CEO himself would not have issued the PCN had he known that the Appellant was in the vehicle. This is evidenced (Enclosure 24) in the CEO's own statement, where the CEO states that they said, "If you saw me, why you not stop me before issuing?" This comment somewhat understandably has bolstered the Appellant's belief that the PCN should not have been issued as he was inside the vehicle. However, it does not alter the fact that the CEO was entitled to issue this PCN, having observed the vehicle for some ten minutes prior to issuing.*
- 15. Whilst I accept, having heard the Appellant's oral evidence, and having read his written representations, that he is frustrated with the approach he contends was taken by the CEO, this has no direct bearing on the issuing of the PCN, which I find was legitimate. The allegations made by the Appellant appear to be a matter which he may choose to pursue with the Council but it is not a matter upon which this tribunal may adjudicate.*
- 16. I am satisfied to the requisite standard that a contravention has taken place and that no statutory ground of appeal or exemption has been established.*
- 17. Accordingly, I must refuse this appeal."*

### **The application for review**

The reviewing adjudicator identified no ground for review.

### **The application for judicial review**

The Court underlined that the fact that the claimant remained in the parked car was immaterial. No illegality or public law error was identified.

### **The appeal decision**

The appeal was refused by the independent adjudicator for the following reasons:

“

1. *This appeal was submitted on behalf of Ms Oksztel by her father, Dr Robert Oksztel. Dr Oksztel said that, while his daughter was driving, a warning light came on in her car and she did not know what it meant. She was suffering from anxiety from a previous car accident, and felt she had to stop immediately so pulled into the parking bay.*
2. *He went on to say that she then contacted her father who told her that it was the battery in her key fob. She was unable to re-start the car. He had spare batteries so drove to where she had parked and changed the battery for her a few minutes later. He had purchased the battery in advance and provided a receipt which was dated some time before the date of the alleged contravention.*
3. *He did not explain why Ms Oksztel was not waiting with the car for him to arrive.*
4. *The council rejected the representations because of the date of the receipt for the replacement battery and they said that it was a driver's responsibility to ensure that the car is not parked in breach of restrictions before it was left unattended.*
5. *A failed battery in a key fob is not an emergency which justifies parking in a restricted parking bay and, had Ms Oksztel felt it necessary to pull in immediately the warning light came on, I would have expected her to remain with the car, if her father was only a few minutes away. Had she done so, she could simply have explained what had happened to the officer.*
6. *I therefore find that the contravention did occur and I dismiss the appeal. Ms Oksztel is required to pay the penalty charge to the council within 28 days.”*

### **The application for review**

The reviewing adjudicator identified no ground for review.

### **The application for judicial review**

The Court identified no realistic prospect of success in establishing that the decision was irrational, cogent reasons having been provided by the original and reviewing adjudicator. The adjudicator has no power to alter the level of penalty imposed.

The outcome of a renewal application is pending.

### **The appeal decision**

The appeal was refused by the independent adjudicator for the following reasons:

“

1. *The Appellant's representative, Mr Barrie Segal, attended the hearing by telephone. The Appellant was not in attendance. Mr Jason Passfield attended on behalf of the Authority.*

## ***The Authority's Case***

2. *It is the Authority's case that the Appellant's vehicle was parked in contravention in a restricted area in Beach House East Car Park, Worthing on 20 April 2023 at 13:33. They rely in evidence on the Civil Enforcement Officer's ("CEO") notes and their photographs of the vehicle; the reservation notices and the car park information board and pay and display machine.*
3. *The CEO's note states: "Virtual stays found and issue continued. Nns nls vic nvp ndb con obs male driver said he had been told to park outside while went for an interview, I informed him of the appeal process".*
4. *There is a close-up photograph of the reservation signs. The top one reads: "Reserved for Southdowns Leisure Trust only. Not for public use". Beneath that wording there is an arrow pointing in both directions either side of the sign. The lower sign is yellow, affixed to which there is a white piece of paper. The top of the sign says "NO PARKING. Parking Suspension". There is then the sign for no waiting at any time, beneath which it says "At any time". The said wording is a little faded but legible. The white piece of paper says:*

*"From 00:01 AM on 31/12/2022  
Until 23:59 PM on 31/12/2023*

*Purpose Reserved for Southdowns Leisure Trust class instructors teaching classes only.  
Location Beach House Car Park East-Front 7 days."*

*The photographs show that the said signs are positioned on an upright signpost situated close to the rear of the Appellant's vehicle.*

## ***The Appellant's Case***

5. *The Appellant's case is set out in the Appellant's "Formal Representations against Notice to Owner" and in Mr Segal's Skeleton Argument. The Authority has provided a Skeleton Argument in response dated 23 February 2024. I set out below the Appellant's representations with my decision in respect of each one.*
6. *During the course of the hearing, Mr Segal raised two additional representations, which I also set out below.*

### ***i. Authorisation to park***

7. *The Appellant maintains that he was authorised to park in the reserved area by the receptionist at the leisure centre. Mr Segal says that, as an employee of the Trust, she clearly had ostensible authority to permit motorists to park in that area.*
8. *At this point, I will refer to the Appellant's evidence. The Appellant says in his Informal Challenge: "There are no clear markings saying this is permit or resident parking when you drive into leisure centre. I was going for an interview and was told to park outside leisure centre and write my Reg number in the centre which I did. This is quite deceiving and not justified when there is parking directly outside centre, road signs need to be made simple and concise this is not the case here. Even when I came out to find a ticket on my car the signs were misleading or confusing".*
9. *In a "Customer Feedback" document dated 20 July 2023 the Appellant says: "This penalty charge notice is not justified, signage with paper and sticky tape not visible and at an angle, no markings when driving in saying permits. Only visible markings when driving in saying car park to leisure centre which I used and then registered my car inside the centre while having an interview for 2nd job as not able to survive on one".*
10. *In the Appellant's "Formal Representations against Notice to Owner" he reiterates the above.*
11. *There is no evidence before me to indicate that the Appellant was specifically told by the receptionist he could park in a reserved area. The Appellant says he was told to park outside leisure centre. This did not entitle him to park in a reserved area. He was, of course, under a duty to ensure that he parked lawfully within the car park, taking notice of any signage.*
12. *In any event, I am not persuaded that the receptionist would have had the Trust's authority, ostensible or otherwise, to direct motorists to park in the reserved area. Mr Passfield said that the Trust was a separate entity to the Authority and the Trust had no authority from the Authority to manage or control the car park.*
13. *I do not accept this ground of appeal.*

## **ii. The signage**

14. *The Appellant maintains that signage was not sufficient to put him on notice of the reservation.*
15. *I take the view that the signage in respect of the reserved places is clear and unambiguous. Mr Segal says in his Skeleton Argument that “the photographs do not show that the vehicle was parked in one of these reserved spaces, it merely shows the car parked with other vehicles without any indication that these are “reserved”. The council’s photographs do not show the location of Mr White’s car relative to the claimed restriction”. As indicated above, one of the CEO’s photographs shows the reservation signs fixed to an upright sign very close to the rear of the Appellant’s vehicle. Accordingly, I take the view that the Appellant should have seen this sign and I am satisfied that it was sufficient to put him on notice of the restriction.*
16. *I am also satisfied that there was no legal requirement for any road markings in respect of the reserved area. Article 12 (see below) of the Borough of Worthing (Off-Street Parking Places) Order 2007 makes no reference to such a requirement.*
17. *The Authority has pointed out that the Traffic Signs Regulations and General Directions do not apply to car parks.*
18. *I do not accept this ground of appeal.*

## **iii. Traffic Management Orders**

19. *It is the Appellant’s case that there is no provision in the Traffic Management Orders for the reservation and therefore, the PCN was unlawful.*
20. *The Authority has referred me to Article 12 of the Borough of Worthing (Off-Street Parking Places) Order 2007, which relates to the power to close or suspend parking places. It states:*

*“Nothing in this order shall prevent the council by notice, sign or barrier displayed in the parking place*

  - i. *from closing the parking place or any part thereof for any period; and/or*
  - ii. *from setting aside the parking place or any part or parts thereof on all days or on certain days or during certain parts of days for use only by particular vehicles or organisations”*
21. *Mr Segal sought to argue that, although Article 12 gave the Authority the power to reserve the parking places, the Authority must prove that this power had been exercised lawfully, and they should have produced the relevant minutes or resolution. Mr Passfield said that the Authority did not need minutes or a resolution to exercise the power and, in any event, there was no requirement for them to provide such evidence. Furthermore, any agreement that they had with the Trust was confidential.*
22. *Mr Segal is, in my view, seeking to put the Authority to proof to an extent that is in excess of the civil standard. There is, in my view, no need for the Authority to prove an evidential chain in the manner suggested. I am entitled to presume, in the absence of any evidence to the contrary, that the said power was exercised by the Authority lawfully in this case.*
23. *I do not accept this ground of appeal.*

## **iv. Procedural impropriety – PCN**

24. *The Appellant maintains that there has been Procedural Impropriety on the basis that the PCN is not substantially compliant. He says the PCN incorrectly states that the penalty charge “...must be paid not later than the last day of the period of 28 days beginning with the date on which the PCN was served”, whereas under Schedule 2 Section 2 (d) of The Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guidelines and General Provisions) (England) Regulations 2022 it says that the PCN must state “that the penalty charge must be paid within the period of 28 days beginning with the date on which the alleged contravention occurred. Mr Segal relies on the decision of another Adjudicator, namely, **Baca v Portsmouth City Council 17 November 2023. Case number PO 00033-2309.***
25. *The date of service and date on which the alleged contravention occurred in the case of a Regulation 9 PCN is the same because the CEO fixes the PCN to the vehicle or gives it to the person appearing to them to be in charge of the vehicle at the time the contravention occurs. Therefore, there is no material difference between the two. It follows that no prejudice was caused to the Appellant. In those circumstances, I am satisfied that the PCN was substantially compliant and there has been no procedural impropriety. On the question of prejudice, I follow the decision in **The Queen on the Application of Bedi v The Traffic Adjudicator [2022] EWHC1795 (Admin)**.*

26. I should add that, although Mr Segal has sought to rely on the case of *Baca*, I am not bound to follow another Adjudicator's decision, particularly in light of the High Court decision referred to above.
27. I do not accept this ground of appeal.
28. The Appellant also maintains that there has been a Procedural Impropriety because the PCN incorrectly states that the Authority may serve a Notice to Owner on the owner of the vehicle on a date based on the date of service rather than on the date on which the alleged contravention occurred.
29. I do not accept this ground of appeal for the same reasons as above.

**v. Procedural impropriety – Notice to Owner**

30. The Notice to Owner is not compliant as it does not list the headings under which the Appellant can appeal as set out in the Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022. Mr Segal referred specifically to Regulation 5(4)(g) and he said that the Notice to Owner should have contained the reference to Part 6 of Schedule 9 to the RTRA 1984 so that the Appellant could check this legislation and whether it applied in his case.
31. I have considered the headings in the said regulations and I have compared them to those listed in the Notice to Owner. I am satisfied that the Notice to Owner is substantially compliant with the regulations. A Notice to Owner does not have to replicate the headings in the regulations verbatim. Under section 3(2)(b), it simply has to include "the nature of the representations which may be made under regulation 5".
32. I do not accept this ground of appeal.

**vi. Procedural impropriety – Notice of Rejection**

33. The Appellant maintains that Authority failed to properly consider the Appellant's formal representations pursuant to section 6(4)(a) of The Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022 in relation to his points on procedural impropriety. The Notice of Rejection states, in respect of procedural impropriety, "I can confirm that there has not been a procedural impropriety by the council and the independent Adjudicators from the Traffic Penalty Tribunal agree that our PCNs and Notice to Owners are compliant". Mr Segal argues that this response was inadequate and unsubstantiated by evidence.
34. The Notice of Rejection as a whole is relatively detailed. In the decision of *R (Halton Borough Council) v Road User Charging Adjudicators and Damien Curzon (interested party) [2023] EWHC 303 (Admin)* it was held that, whilst a complete failure to consider representations would be a procedural impropriety, anything less would not. Although the Authority's comments on procedural impropriety are relatively brief, I am satisfied that they did consider the procedural issues and so I am not satisfied that there was a complete failure to consider them. In those circumstances, I am not satisfied that there has been procedural impropriety and I do not accept this ground of appeal.

**vii. Procedural impropriety – Evidence provided on appeal**

35. This representation was raised for the first time during the hearing. Mr Segal argued that there had been procedural impropriety by the Authority for failing to provide in evidence a complete copy of the PCN. The copy provided simply consists of the first page. Mr Segal referred me to Section 3 of the Civil Enforcement of Road Traffic Contraventions (Representations and Appeals) (England) Regulations 2022. I assume that the specific regulation on which he seeks to rely is Section 3(3)(b) which says that the Authority, on receipt of a Notice of Appeal must send, amongst other things, "the relevant penalty charge notice (if any)" to the proper officer within 7 days.
36. Mr Passfield said that it was not the Authority's practice to provide the second page in each case because it is a standard document, a replica of which has been lodged with the Tribunal.
37. It is, in my view, the first page of the PCN that contains the key and case specific evidence and I accept that the second page is a standard document that is the same in each case. I should point out that Mr Segal has provided the Tribunal with a copy of both pages of the original PCN, it having been attached as an appendix to his Skeleton Argument. Therefore, the absence of a replica of the second page in the evidence has not in any way prejudiced the Appellant. In any event, I take the view that the Authority, in providing the Tribunal with a copy of the key first page has substantially complied with the regulations given that the second page is a standard document, which has been



*lodged as such with the Tribunal. In those circumstances, I am not satisfied that there has been procedural impropriety and I do not accept this ground of appeal.*

**viii. Relationship between Worthing Borough Council and West Sussex County Council**

- 38. This representation was raised for the first time in the hearing. Mr Segal pointed out that the PCN was headed with the names of both councils and he questioned the nature of any agency agreement between them and argued that such an agreement should have been disclosed in evidence. Mr Passfield explained that his Authority acts as agent for West Sussex County Council in respect of on street contraventions, but not in respect of off-street contraventions as in this case and therefore, no question of agency arose. I note that the PCN refers specifically to the said agency arrangement and so the Authority has been transparent about it.*
- 39. I am satisfied that the Authority does not act as agents for West Sussex County Council in respect of off-street contraventions and therefore, the point does not merit further investigation. In any event, if there were such an agency agreement in respect of off-street contraventions, I fail to see how it would be relevant in this case, given that the contravention occurred in Worthing and not West Sussex. Accordingly, I do not accept that this representation amounts to a ground of appeal.*

**Decision**

- 40. Based on the Authority's evidence, I am satisfied that there was a contravention*
- 41. I have not found in favour of the Appellant in respect of any of his representations and therefore, the appeal is refused."*

**The application for review**

The reviewing adjudicator identified no ground for review.

**The application for judicial review**

The council interested party cancelled the penalty as a gesture of goodwill. The Court identified no public interest reasons for allowing the claim to proceed.

## 2.3 Applications – outcome pending

*There are no pending outcomes.*

### 3. Key Cases

**Most appeals are fact based and determined on the evidence provided by the parties for that particular appeal. A key case is a case that provides guidance regarding the interpretation and application of the law and regulations. The Tribunal is assisted by a key case issued in Scotland in this reporting year:**

**Glasgow City Council v Hamilton [2025] CSIH – summary below:**

1. Mr Hamilton drove his car, which did not comply with the Low Emission Zone (“LEZ”) requirements, in the Glasgow LEZ. The enforcement authority (“the Council”) sent him a penalty charge notice (“PCN”) in the ordinary post. He sent in representations to the Council, saying that he inadvertently drove into the LEZ, being in a part of the city with which he was not familiar and not having seen the LEZ warning signs. He should not be required to pay any penalty. Those representations were rejected.
2. Mr Hamilton appealed to the First-tier Tribunal for Scotland (“FtTS”), where the Chief Adjudicator identified a preliminary point, namely the failure of the Council to serve the PCN in a way prescribed by section 26 of the Interpretation and legislation Reform (Scotland) Act 2010, which provides that a person may be served in a variety of ways, including by registered post or recorded delivery, but not by ordinary post. Having heard submissions, the Chief Adjudicator held that a PCN which had not been served in accordance with section 26 was invalid and could not be enforced. He allowed Mr Hamilton’s appeal.
3. The Council appealed to the Upper Tribunal for Scotland (“UTS”), which purported to follow *R v Soneji* [2006] 1 AC 340 which identified the relevant question as whether Parliament intended a failure to comply with a statutory requirement should invalidate the relevant notice. The UTS held that it could be inferred that Parliament did intend valid service as a precondition of the PCN existing. That there was no unfairness to Mr Hamilton was an irrelevant consideration. It dismissed the appeal.
4. The Council appealed to the Inner House of the Court of Session (the equivalent of the Court of Appeal of England & Wales), where the appeal was allowed.
5. The Court relied on well-trodden authorities going back to *London & Clydesdale Estates Ltd v Aberdeen District Council* [1980] SC (HL) 1 and including *Soneji*, which pose two relevant questions. First, did Parliament intend service of a notice in the prescribed manner to be a prerequisite to the exercise of a statutory power without which the exercise of that power would automatically be a nullity? If it did, then the failure to serve in that way is fatal to any attempt to enforce anything done under that power on the basis of the notice. If it did not, then, second, given the purpose of serving the notice (i.e. to inform the recipient of the circumstances and consequences of the breach including how the penalty might be challenged), in all the circumstances, did Parliament intend such a lapse in procedure to defeat the substantive purpose of the legislation (i.e. to maintain clean air)? This second question requires consideration of all the relevant circumstances including the purpose of legislative scheme and the consequences for the recipient of the failure of the Council to comply in terms of procedural fairness. The concept of “substantial compliance” does not have a part in this analysis.
6. The Court held, on the first question, that the manner of service of a PCN was not crucial to the legislative scheme, such that a failure to serve in an appropriate manner automatically rendered invalid the exercise of the powers triggered by the notice. On the second question, the Court concluded that Mr Hamilton, who accepted that he had in fact received and responded to the PCN and then appealed to the FtTS, had not suffered any procedural unfairness. Parliament could not have intended that a lapse in procedure that was inconsequential in terms of procedural fairness would defeat the substantive purpose of the legislative scheme. The Court therefore allowed the appeal and remitted the matter to the FtTS for determination on the case on its merits.
7. This is, of course, a Scottish case; but it relies on precedent that is binding in England & Wales, and it is in any event at appellate level such that it would be of strong persuasive value in any event. Where there is an alleged procedural error by the enforcement authority, this case suggests that it is unlikely that Parliament intended that to be a “knock out blow” so far as enforcement is concerned: as the Inner House put it, that would be to put “the procedural cart before the substantive horse”. Therefore, where such a procedural error is proved, it will be necessary to assess whether the recipient of the PCN has suffered any prejudice in terms of procedural unfairness. If they have not, then it is likely that Parliament can be taken as not treating such an error/defect as fatal to enforcement on the relevant PCN, so the error/defect is immaterial.

**The full judgment can be read via the *Traff-iCase* website: <https://www.keycases.info/key-cases/>.**

## 4. Training and Appraisal

### 4.1 Training

Adjudicators attended their annual training day in Birmingham on 26 November 2024.

This mandatory training session allows the adjudicators, who all work remotely, to meet and exchange knowledge and share best practice. This is particularly valuable with a number of adjudicators holding appointments at other courts and tribunals, allowing all adjudicators to benefit from experiences gained in wider jurisdictions.

The training day included a presentation on the Tribunal's online case management system, ensuring adjudicators continue to use the system optimally and allowing them to have insight and a fuller understanding as to how the system presents to users. The adjudicators also attended a presentation on diversity and inclusion, an area of training that is now embedded in induction and continuous training programmes for all Courts and Tribunal Judiciary.

Other than this annual in-person meeting, adjudicators hold an annual remote video meeting – this took place on 24 March 2025. The meeting allowed for joint discussions on the Tribunal's processes, ensuring an up-to-date and consistent approach to case management and the sharing of views on any issues that may have arisen during the course of the year.

### 4.2 Appraisal

Individual appraisal is mandatory at the Traffic Penalty Tribunal. Taking part in the appraisal scheme not only ensures that standards are maintained and the law and regulations applied consistently, but also that public confidence in judicial performance is maintained. The adjudicators welcome appraisal, recognising that discussions support the progression and development of their work and judicial career.

The Tribunal applies the judicial skills and abilities framework issued to Courts and Tribunals Judiciary, with the reviewed framework introduced by the Lady Chief Justice and the Senior President of Tribunals in January 2025 now adopted for future appraisals. The framework reflects the expectations required of judicial office holders, which include tribunal judges such as the adjudicators, who are independent office holders exercising a judicial function.

The judicial requirements of independence, impartiality and integrity are supported by the individual judicial skills and abilities:

- (a) Legal and judicial skills – including: legal knowledge and analytical skills, sound judgment and decisiveness.
- (b) Communication skills and personal qualities – including: effective active listening, written communication skills, appropriate authority in the conduct of a hearing and an efficient use of judicial resources.
- (c) Effective working – including: diligence and efficiency, timely decisions and a collegiate and inclusive approach.

The next round of appraisals is due to start in July 2025. As before, the expectation is that in light of our shared standards this will be a joint initiative with London Tribunals (Environment and Traffic).

## 5. The Adjudicators

The tribunal endeavours to work closely with colleagues at London Tribunals and a number of adjudicators are office holders at both tribunals (including Transport for London's Road User Charging Tribunal).

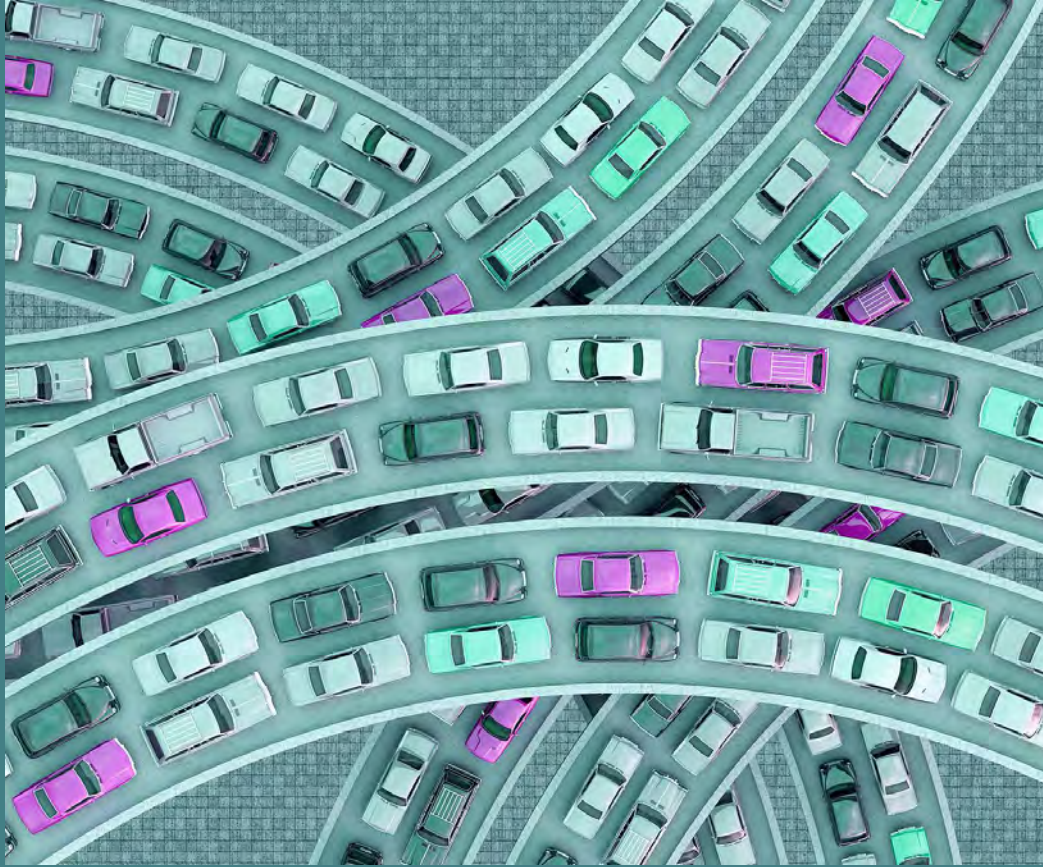
### Current full adjudicator list:

1. Philippa Alderson\*\*
2. Andrew Barfoot
3. Davin Binns
4. Teresa Brennan\*
5. Michael Burke\*
6. Katherine Cartwright
7. Joanne Coombe\*\*
8. George Dodd\*\*
9. Gillian Ekins\*
10. Cordelia Fantinic\*
11. Bhopinder Gandham
12. Joanne Garbett
13. Natalie Goffe\*\*
14. Toby Halliwell
15. Caroline Hamilton\*
16. Martin Hoare\*
17. Annie Hockaday
18. Judith Ordish
19. Belinda Pearce\*\*
20. James Richardson
21. Mackenzie Robinson\*
22. Timothy Thorne\*
23. Sarah Tozzi
25. Rhys Williams
26. Jill Yates

\* Environment and Traffic Adjudicators  
at London Tribunals

\*\* Road User Charging Adjudicators  
and Environment and Traffic Adjudicators  
at London Tribunals

The adjudicators are grateful to the administrative support teams, their hard work and efficiency, allowing the adjudicators to focus on determining appeals in a timely and proportionate manner.



**Traffic Penalty  
Tribunal**  
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### **PATROL Adjudication Joint Committee**

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<b>Date of Meeting:</b>	15 <sup>th</sup> July 2025
<b>Report Title:</b>	Re-appointment of Adjudicators
<b>Report of:</b>	Caroline Hamilton, The Chief Adjudicator

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#### **1.0 Purpose of Report**

- 1.1** To advise of the re-appointment of the fee paid office holder adjudicators.

#### **2.0 Recommendation**

- 2.1** To note the re-appointment of the listed adjudicators (attached at Appendix One) for a further five-year period from 22<sup>nd</sup> May 2030 or until their 70<sup>th</sup> birthday if sooner.

#### **3.0 Reasons for Recommendation**

- 3.1** Under the Civil Enforcement of Road Traffic Contraventions (Approved Devices, Charging Guideline and General Provisions (England) Regulations 2022 and the Civil Enforcement of Road Traffic Contraventions (General Provisions) (Wales) Regulations 2013, any decision not to re-appoint the independent adjudicator cannot have effect without the consent of the Lord Chancellor and the Lady Chief Justice.

#### **4.0 Background**

- 4.1** Adjudicators are appointed under the terms of the Traffic Management Act 2004. Section 81 provides that adjudicators are appointed for a period not exceeding five years. On expiry of that term there is a presumption of renewal. Accordingly, under the delegated powers from the PATROL Joint Committee to the Chief Adjudicator, the named adjudicators have been re-appointed until 22<sup>nd</sup> May 2030 or until their 70<sup>th</sup> birthday if sooner.



- 4.2** Adjudicator Gillian Ekins, appointed to the tribunal in 2001, and Adjudicator Jill Yates, appointed to the tribunal in 2013, are retiring from the tribunal and do not seek the renewal of their appointments. The Committee is invited to extend its thanks to adjudicators Ms Ekins and Ms Yates for their solid commitment to the work of the tribunal over the years, wishing them well in their retirement.

## **5.0 Implications**

### **5.1 Finance**

- 5.1.1** The adjudicators are independent office holders determining appeals on a fee paid basis.

### **6.1 Risk Management**

- 6.1.1** The re-appointment of adjudicators ensures that a sufficient pool of adjudicators (all part-time office holders) remains available to determine registered appeals, allowing the tribunal users to continue to receive timely, efficient and cost-efficient appeal outcomes.

### **7.1 Legal**

- 7.1.1** Under the Traffic Management Act 2004, the adjudicators listed at Appendix One are entitled to re-appointment.

## **APPENDIX ONE**

### **Adjudicators Entitled to Re-appointment**

1. Philippa Alderson
2. Andrew Barfoot
3. Davin Binns
4. Teresa Brennan\*
5. Michael Burke
6. Katherine Cartwright
7. Joanne Coombe
8. George Dodd
9. Cordelia Fantinic
10. Bhopinder Gandham
11. Joanne Garbett
12. Natalie Goffe
13. Toby Halliwell
14. Martin Hoare
15. Annie Hockaday
16. Judith Ordish
17. Belinda Pearce\*
18. James Richardson
19. Mackenzie Robinson
20. Timothy Thorne
21. Sarah Tozzi
22. Rhys Williams

\* Appointed to 70<sup>th</sup> birthday



## **PATROL ADJUDICATION SERVICE JOINT COMMITTEE**

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**Date of Meeting:** Tuesday 15<sup>th</sup> July 2025

**Report Title:** Draft Annual Return PATROL 2024/25

**Report of:** The Director

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### **1.0 Report Summary**

This report presents the draft Annual Return for the year 2024/25 for PATROL.

### **2.0 Recommendations**

#### **That the Joint Committee:**

- a. Notes the outturn position against the 2024/25 budget included with the report **(Appendix 1) – subject to external audit validation**
- b. Approves the **surplus** for the year of £431,741 to be added to the Joint Committee's Reserves.  
  
This excludes £208,930 being the total of National Highways (Dartford-Thurrock River Crossing) and Halton Borough Council.
- c. Determines that the Executive Sub Committee review the basis for defraying expenses, following budget monitoring at the half year point, at their meeting in October 2025.
- d. Notes the Balance Sheet **(Appendix 2)** and Cash Flow **(Appendix 3)** and audit timetable
- e. Notes the Small Bodies Draft Annual Return to be submitted for External Audit **(Appendix 4)**
- f. Notes the Annual Internal Audit Report 2024/25 **(Appendix 5)**.

### **3.0 Reasons for Recommendations**

Required under the Joint Committee Financial Regulations to finalise the accounts for 2024/25.

## 4.0 Background

At the meeting of the Executive Sub Committees held on 21<sup>st</sup> January 2025 it was agreed to adopt the revenue budget estimates set out in this report.

**4.1** The outturn position for PATROL to 31<sup>st</sup> March 2025 is enclosed at **Appendix 1**  
The Balance Sheet for PATROL at 31<sup>st</sup> March 2025 is shown at **Appendix 2**  
The Cash Flow for PATROL for the year 2024/25 is shown at **Appendix 3**

**4.2** Should it be the case that there is a need for greater expenditure than that provided for in the approved budget, there is a recommendation to authorise the Director to incur additional expenditure, provided such expenditure does not exceed the income for the current year.

**4.3** Should it be the case that the revenue account falls into deficit then the surplus from previous years is available.

**4.4** Should there be greater income than expenditure in the year then there is a recommendation that this be transferred into the succeeding year as reserves.

## 4.5 Income and Expenditure Summary – PATROL

SUMMARY TO DATE			
	31/03/2025	31/03/2025	31/03/2025
	Year to Date	Budget	Var to Budget
Income	3,624,106	3,201,057	423,049
Expenditure	2,983,435	3,348,752	365,317
Surplus / (Deficit)	<b>640,670</b>	<b>-147,695</b>	<b>788,365</b>
<b>Breakdown of Surplus</b>			
PATROL	431,741	-81,618	513,359
Halton Borough Council	45,468	34,457	11,011
National Highways	163,462	-100,534	263,996
	<b>640,670</b>	<b>-147,695</b>	<b>788,365</b>
		0	

A positive variance in Income (£423,049) and a positive variance in Expenditure (£365,317) combine to give a result which was £788,365 better than budgeted.

Of this amount £431,741 relates to PATROL surpluses and the balance is ringfenced to Halton Borough Council (in respect of the Mersey Gateway) and National Highways (in respect of the Dartford River Crossing).

**Income:**

- Income for the year 2024/25 is £423,049 higher than budget (positive variance of 13.2%)
- Of this amount £244,782 relates to higher National Highways Income due to a change in contracts at the end of 2023/24 resulting in a hold on PCNs being issued in 2023/24 and subsequently issued in the year in question.
- Moving Traffic income was £79,916 higher than budgeted due to new enforcement
- Clean Air Zone income was £172,609 lower than budgeted – this was primarily due to Bristol and Birmingham PCN issuance dropping from the previous year
- Other Income relates to recharges to other organisations – the negative variance here of £21,261 relates to cessation of one of these recharges to a partner organisation

**Expenditure:**

- Expenditure for the year 24/25 is £365,317 underspent (positive variance of 10.9%)
- Adjudicator costs were underspent by £114,658 – of this £15,000 relates to recruitment not required, £30,000 relates to training, meetings and conferences not required, and £35,000 relates to non-utilised Adjudicator Fees
- Staff costs were underspent by £270,485 due to unfilled vacancies and other efficiencies, these are predominantly:
  - 4 Customer Liaison roles totalling £150,000
  - Additional finance resource – 6 months - £20,000
  - Comms Assistant - £45,000
- Supplies and Services were underspent by £39,847 (16.7%). This predominantly relates to Legal Fees Provision and other external consultants not required

## 4.6 Reserves – PATROL

The Reserves position at 31<sup>st</sup> March 2025 for PATROL is summarised as follows:

PATROL Only				
	Reserves	Approved	Reserves	Movement
<b>Opening Reserves 2022/23</b>	<b>2,568,455</b>	<b>1,893,880</b>	<b>674,575</b>	<b>347,960</b>
Reserves for year 2022/23	403,982			
Drawdown 2022/23	0			
<b>Opening Reserves 2023/24</b>	<b>2,972,437</b>	<b>2,095,228</b>	<b>877,209</b>	<b>202,634</b>
Bus Lane Reserves TFR In	713,799			
Reserves for year 2023/24	450,163			
Drawdown 2023/24	-30,014			
<b>Opening Reserves 2024/25</b>	<b>4,106,385</b>	<b>2,222,251</b>	<b>1,884,134</b>	<b>1,884,134</b>
Reserves for year 2024/25	431,741			
Drawdown 2024/25	-21,272			
<b>CLOSING RESERVES 2024/25</b>	<b>4,516,853</b>	<b>2,222,251</b>	<b>2,294,602</b>	<b>1,417,393</b>

The Reserves balance at 31<sup>st</sup> March 2025 for PATROL (excluding amounts ringfenced for National Highways and Halton Borough Council) are £4,516,853 (FREE Reserves are £2,294,602).

This amount includes accumulated Reserves brought across from the BLASJC Reserves of £713,799.

## 4.7 External Audit

The external audit timetable is as follows:

Stage	Dates
Draft Annual Return submitted to PATROL AJC for approval	15th July 2025
Submission of Small Bodies Annual Return and Supporting Documents to BDO for external audit	16 <sup>th</sup> July 2025
Completion of External Audit reported to Joint Committee	15 <sup>th</sup> October 2024

## 4.8 Internal Audit Report 2024/25

Internal audit is provided by the Host Authority. The Internal Audit Report is at **Appendix 5**.

**There are NO recommendations for action or improvement.**

Historical number of recommendations is shown below:

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Low	1	0	2	0	0	0
Medium	3	0	0	0	0	0
High	0	0	0	0	0	0
TOTAL	4	0	2	0	0	0

**The level of assurance for 2024/25 is GOOD which is the highest level that can be awarded.**

## 5.0 Implications

### 5.1 Finance

To adhere to the Financial Regulations.

### 6.0 Risk Management

To provide assurance on the financial stability of the Joint Committee and to inform the Risk Management Framework.

## Appendix 1 – PATROL Outturn:

	Year to Date					
	31/03/2025	31/03/2025	31/03/2025	31/03/2025	31/01/2025	
	Year to Date	Budget	Var to Budget	Var to Budget	Prior Year **	Var to Current Yr
<b>Income:</b>						
PATROL *	1,724,265	1,446,181	278,084	19.2%	1,588,943	135,322
Bus Lane Income	481,397	516,675	-35,278	-6.8%	519,351	-37,954
Moving Traffic Income	127,294	47,378	79,916	168.7%	57,855	69,439
<b>Road User Charging:</b>						
National Highways - Income	754,782	510,000	244,782	48.0%	567,713	187,069
Halton Borough Council - Income	155,397	175,272	-19,876	-11.3%	180,122	-24,726
Clean Air Zones - Income	232,366	404,975	-172,609	-42.6%	385,142	-152,776
LFV - Income	3,697	376	3,321	883.4%	1,812	1,885
Bank Interest Received	131,680	66,000	65,680	99.5%	93,688	37,992
Sale of Assets	290	0	290	0.0%	330	-40
Other Income	12,939	34,200	-21,261	-62.2%	36,255	-23,316
<b>Total Income</b>	<b>3,624,106</b>	<b>3,201,057</b>	<b>423,049</b>	<b>13.2%</b>	<b>3,431,211</b>	<b>192,895</b>
<b>Expenditure:</b>						
Adjudicators	905,431	1,020,089	114,658	11.2%	845,074	-60,357
Staff	1,248,329	1,518,814	270,485	17.8%	1,297,961	49,632
Premises / Accommodation	79,425	81,500	2,075	2.5%	74,434	-4,991
Transport	14,664	17,000	2,336	13.7%	21,444	6,780
Supplies and Services	199,094	238,941	39,847	16.7%	119,456	-79,638
IT	476,408	411,201	-65,207	-15.9%	387,118	-89,290
Services Management and Support	61,040	56,007	-5,033	-9.0%	53,340	-7,700
Audit Fees	2,415	5,200	2,785	53.6%	4,510	2,095
Bad Debts - movement on provision	-3,370	0	3,370	0.0%	-14,925	-11,555
<b>Total Expenditure</b>	<b>2,983,435</b>	<b>3,348,752</b>	<b>365,317</b>	<b>10.9%</b>	<b>2,788,412</b>	<b>-195,023</b>
<b>Surplus / (Deficit)</b>	<b>640,670</b>	<b>-147,695</b>	<b>788,365</b>		<b>642,799</b>	<b>-2,129</b>
		0			0	-0
<b>Breakdown of Surplus</b>	<b>640,670</b>	<b>-147,695</b>	<b>788,365</b>		<b>642,799</b>	<b>-2,129</b>
<b>PATROL *</b>	<b>431,741</b>	<b>-81,618</b>	<b>513,359</b>		<b>420,151</b>	<b>11,590</b>
<b>Halton Borough Council</b>	<b>45,468</b>	<b>34,457</b>	<b>11,011</b>		<b>68,591</b>	<b>-23,123</b>
<b>National Highways</b>	<b>163,462</b>	<b>-100,534</b>	<b>263,996</b>		<b>154,057</b>	<b>9,405</b>

## Appendix 2 – PATROL Balance Sheet:

### BALANCE SHEET - PATROL

	Apr-24 p1	May-24 p2	Jun-24 p3	Jul-24 p4	Aug-24 p5	Sep-24 p6	Oct-24 p7	Nov-24 p8	Dec-24 p9	Jan-25 p10	Feb-25 p11	Mar-25 p12
<b>Current Assets</b>												
LA Debtors	638,374	166,570	139,963	558,180	290,279	141,967	783,059	477,687	116,174	705,253	271,769	50,831
Other Debtors	64,817	113,682	125,044.13	128,932	143,936	144,346	124,068	67,235	44,395	122,508	64,728	102,994
VAT												
Cash and Bank	3,635,127	3,973,574	3,883,311	3,680,240	3,695,859	3,691,479	3,579,749	3,695,995	3,985,265	3,938,726	4,171,525	4,071,518
<b>Total</b>	<b>4,338,317</b>	<b>4,253,826</b>	<b>4,148,318</b>	<b>4,367,352</b>	<b>4,130,074</b>	<b>3,977,792</b>	<b>4,486,876</b>	<b>4,240,917</b>	<b>4,145,834</b>	<b>4,766,488</b>	<b>4,508,022</b>	<b>4,225,343</b>
<b>Current Liabilities</b>												
Trade Creditors	9,988	19,066	1,098	200,976	5,806	136,817	126,797	1,312	4,167	161,638	261,287	199,581
Other Public Bodies												
Other Creditors	-186,849	-268,726	-415,669	-276,797	-369,517	-761,221	-308,539	-422,468	-410,438	-142,572	-503,295	-611,343
<b>Total</b>	<b>-176,862</b>	<b>-249,660</b>	<b>-414,571</b>	<b>-75,821</b>	<b>-363,710</b>	<b>-624,404</b>	<b>-181,742</b>	<b>-421,155</b>	<b>-406,271</b>	<b>19,066</b>	<b>-242,008</b>	<b>-411,762</b>
<b>Net Current Liabilities</b>	<b>4,515,179</b>	<b>4,503,486</b>	<b>4,562,889</b>	<b>4,443,173</b>	<b>4,493,785</b>	<b>4,602,196</b>	<b>4,668,618</b>	<b>4,662,072</b>	<b>4,552,105</b>	<b>4,747,422</b>	<b>4,750,029</b>	<b>4,637,105</b>
Long Term (Liabilities)/Assets	0	0										
<b>NET ASSETS</b>	<b>4,515,179</b>	<b>4,503,486</b>	<b>4,562,889</b>	<b>4,443,173</b>	<b>4,493,785</b>	<b>4,602,196</b>	<b>4,668,618</b>	<b>4,662,072</b>	<b>4,552,105</b>	<b>4,747,422</b>	<b>4,750,029</b>	<b>4,637,105</b>
<b>Financed By:</b>												
Pension Reserve												
Reserves BF	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536	4,402,536
Reserves drawdown	-11,035	-139,248	-139,248	-329,310	-334,610	-349,078	-362,471	-362,471	-362,471	-375,618	-388,527	-406,102
Current Year Surplus	123,677	240,198	299,600	369,947	425,858	548,737	628,553	622,007	512,040	720,504	736,020	640,670
<b>TOTAL NET WORTH</b>	<b>4,515,178</b>	<b>4,503,486</b>	<b>4,562,889</b>	<b>4,443,173</b>	<b>4,493,784</b>	<b>4,602,195</b>	<b>4,668,618</b>	<b>4,662,072</b>	<b>4,552,105</b>	<b>4,747,422</b>	<b>4,750,029</b>	<b>4,637,105</b>

## Appendix 3 – PATROL Cash Flow:

### CASH FLOW - PATROL

	Apr-23 p1	May-23 p2	Jun-23 p3	Jul-23 p4	Aug-23 p5	Sep-23 p6	Oct-23 p7	Nov-23 p8	Dec-23 p9	Jan-24 p10	Feb-24 p11	Mar-24 p12
<b>Opening Cash Balance</b>	<b>2,202,197</b>	<b>3,635,127</b>	<b>3,973,574</b>	<b>3,883,311</b>	<b>3,680,240</b>	<b>3,695,859</b>	<b>3,691,479</b>	<b>3,579,749</b>	<b>3,695,995</b>	<b>3,985,265</b>	<b>3,938,726</b>	<b>4,171,525</b>
Decrease / (Increase) in LA Debtors	-495,588	471,803	26,608	-418,218	267,901	148,312	-641,093	305,372	361,513	-589,079	433,484	220,938
Decrease / (Increase) in Other Debtors	7,159	-48,865	-11,362	-3,888	-15,004	-409	20,277	56,834	22,840	-78,113	57,781	-38,266
Decrease / (Increase) in VAT Debtor	0	0	0	0	0	0	0	0	0	0	0	0
Increase / (Decrease) in Trade Creditors	-118,462	9,078	-17,968	199,878	-195,170	131,011	-10,020	-125,485	2,855	157,471	99,650	-61,707
Increase / (Decrease) Public Body Creditors	0	0	0	0	0	0	0	0	0	0	0	0
Increase / (Decrease) in Other Creditors	386,465	-81,877	-146,943	138,871	-92,719	-391,705	452,682	-113,929	12,030	267,866	-360,723	-108,048
Movement on Reserves	1,653,356	-11,692	59,403	-119,716	50,611	108,411	66,423	-6,546	-109,967	195,317	2,607	-112,924
<b>Closing Cash Balance</b>	<b>3,635,127</b>	<b>3,973,574</b>	<b>3,883,311</b>	<b>3,680,240</b>	<b>3,695,859</b>	<b>3,691,479</b>	<b>3,579,749</b>	<b>3,695,995</b>	<b>3,985,265</b>	<b>3,938,726</b>	<b>4,171,525</b>	<b>4,071,518</b>



## Appendix 4 – Small Bodies DRAFT Annual Return – PATROL:

### Joint Committees

### Return for the financial year ended 31 March 2025

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The return on pages 2 to 5 is made up of four sections:

- Sections 1 and 2 are completed by the person nominated by the Joint Committee
- Section 3 is completed by the Joint Committee's internal audit provider.

#### Completing your return

Guidance notes, including a completion checklist, are provided on page 6 and at relevant points in the return.

Complete all sections highlighted in red. Do not leave any red box blank. Incomplete or incorrect returns require additional work and so may incur additional costs.

Send the return, together with your bank reconciliation as at 31 March 2025, an explanation of any significant year on year variances in the accounting statements and any additional information requested, to us, BDO LLP, by the due date.

We will identify and ask for any additional documents needed for our work. Therefore, unless requested, do not send any original financial records.

Once we have completed our work, the completed return will be returned to the Joint Committee.

It should not be necessary for you to contact us for guidance.

## Section 1 – Governance statement 2024/25

We acknowledge as the members of

Enter name of  
reporting body here:

**PARKING & TRAFFIC REGULATIONS OUTSIDE  
LONDON ADDUCTION JOINT COMMITTEE**

Our responsibility for ensuring that there is a sound system of internal control, including the preparation of the accounting statements. We confirm, to the best of our knowledge and belief, with respect to the accounting statements for the year ended 31 March 2025, that:

	Response		Notes that accompany
	Yes	No	
1 We approved the accounting statements prepared in accordance with the guidance notes within this Return.	✓		Prepared its accounting statements and approved them.
2 We maintained an adequate system of internal control, including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	✓		Made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge
3 We took all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with generally accepted good practice that could have a significant financial effect on the ability of the body to conduct its business or on its finances and have reported our financial results to our host authority for inclusion in their accounts.	✓		Has only done what it has the legal power to do and has complied with general accepted good practice
4 We carried out an assessment of the risks facing the body and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	✓		Considered the financial and other risks it faces and has dealt with them properly.
5 We maintained throughout the year an adequate and effective system of internal audit of the body's accounting records and control systems.	✓		Arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of the body.
6 We took appropriated action on all matters raised during the year in reports from internal audit and external reviews.	✓		Responded to matters brought to its attention by internal and external reviewers.
7 We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during for after the year-end, have a financial impact on the body and where appropriate have included them in the accounting statements.	✓		Disclosed everything it should have about its business activity during the year including events taking place after the year-end if relevant.

The governance statement is approved by the Joint Committee and recorded as minute reference

Date

Signed by:

Chair

Signed by:

Clerk

\*Note: Please provide explanations on a separate sheet for each 'No' response. Describe how the joint committee will address the weaknesses identified.

## Section 2 – Accounting Statements 2024/25 for

Enter name of reporting body here:

**PARKING & TRAFFIC REGULATIONS OUTSIDE LONDON ADJUDICATION JOINT COMMITTEE**

	Year ending		Notes and guidance
	31 March 2024 £	31 March 2025 £	
1 Balances brought forward	3,232,555	4,402,537	Total balances and reserves at the beginning of the year as recorded in the body's financial records. Value must agree to Box 7 of previous year.
2 (+) Income from local taxation and/or levy	713,799	—	Total amount of local tax and/or levy received or receivable in the year including funding from a sponsoring body. Excluding any grants received.
3 (+) Total other receipts	3,431,209	3,624,106	Total income or receipts as recorded in the cashbook less the taxation and/or levy (line 2). Include any grants received here.
4 (-) Staff costs	2,136,056	2,223,150	Total expenditure or payments made to and on behalf of all employees. Include salaries and wages, PAYE and NI (employees and employers), pension contributions and employment expenses.
5 (-) Loan interest/capital repayments	—	—	Total expenditure or payments of capital and interest made during the year on the body's borrowings (if any).
6 (-) All other payments	838,970	1,166,388	Total expenditure or payments as recorded in the cashbook less staff costs (line 4) and loan interest/capital repayments (line 5).
7 (=) Balances carried forward	4,402,537	4,637,105	Total balances and reserves at the end of the year. Must equal (1+2+3) – (4+5+6).
8 Total cash and short term investments	3,645,176	4,078,788	The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – to agree with bank reconciliation.
9 Total fixed assets plus other long term investments and assets	—	—	The original Asset and Investment Register value of all fixed assets, plus other long term assets owned by the body as at 31 March.
10 Total borrowings	—	—	The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).

I certify that for the year ended 31 March 2025 the accounting statements in the return present fairly the financial position of the Joint Committee and its income and expenditure, or properly present receipts and payments, as the case may be.

Signed by Responsible Financial Officer:

**[Signature]**

Date

**[Date]**

I confirm that these accounting statements were approved by the Joint Committee on:

**[Date]**

and recorded as minute reference:

**[Date]**

Signed by Chair of meeting approving these accounting statements:

**[Signature]**



### Section 3 – Annual internal audit report 2024/25 to

Enter name of reporting body here:

PARKING & TRAFFIC REGULATIONS OUTSIDE  
LONDON ADJUDICATION JOINT COMMITTEE

The Joint Committee's internal audit service provider, acting independently and on the basis of an assessment of risk, carried out a selective assessment of compliance with relevant procedures and controls expected to be in operation during the financial year ended 31 March 2025.

Internal audit has been carried out in accordance with the Joint Committee's needs and planned coverage.

On the basis of the findings in the areas examined, the internal audit conclusions are summarised in this table. Set out below are the objectives of internal control and alongside are the internal audit conclusions on whether, in all significant respects, the control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of the Joint Committee.

Internal control objective	Agreed? Please choose one of the following		
	Yes	No	Not covered**
A. Appropriate accounting records have been kept properly throughout the year.	✓		
B. The Joint Committee's financial regulations have been met, payments were approved and VAT was appropriately accounted for.	✓		
C. The Joint Committee assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.	✓		
D. The annual taxation or levy or funding requirements resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	✓		
E. Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	✓		
F. Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.	✓		
G. Salaries to employees and allowances to members were paid in accordance with the body approvals, and PAYE and NI requirements were properly applied.	✓		
H. Asset and investments registers were complete and accurate and properly maintained.	✓		
I. Periodic and year-end bank account reconciliations were properly carried out.	✓		
J. Accounting statements prepared during the year were prepared on the correct accounting basis, agreed to the cash book, were supported by an adequate audit trail from underlying records, and, where appropriate, debtors and creditors were properly recorded.	✓		

For any other risk areas identified by the Joint committee (list and other risk areas below or on separate sheets if needed) adequate controls existed:

Name of person who carried out the internal audit:

Josie Griffiths

Signature of person who carried out the internal audit:



Date:

10 06 2025

\*Note. If the response is 'no' please state the implications and action being taken to address any weakness in control identified (add separate sheets if needed).

\*\*Note. If the response is 'not covered' please state when the most recent internal audit work was done in this area and when it is next planned, or, if coverage is not required, internal audit must explain why not (add separate sheets if needed).

## Guidance notes on completing the 2024/2025 return

1. Make sure that your return is complete (i.e. no empty red boxes), and is properly signed and dated. Avoid making any amendments to the completed return. But, if this is unavoidable, make sure the amendments are drawn to the attention of and approved by the body, properly initialled and an explanation provided to us. Returns containing unapproved or unexplained amendments will be returned and may incur additional costs.
2. Use the checklist provided below. Use a second pair of eyes, perhaps a member of the committee or the Chair, to review your return for completeness before sending it to us.
3. Do not send us any information not specifically asked for. Doing so is not helpful. However, you must notify us of any change of Clerk, Responsible Financial Officer or Chair.
4. Make sure that the copy of the bank reconciliation or letter confirming the balance held on your behalf which you send with the return covers all your bank balances. If the joint committee holds any short-term investments, note their value on the bank reconciliation. We must be able to agree your bank reconciliation to Box 8 on the Accounting statements. You must provide an explanation for any difference between Box 7 and Box 8.
5. Explain fully significant variances in the accounting statements on page 3. Do not just send in a copy of your detailed accounting records instead of this explanation. We want to know that you understand the reasons for all variances. Include a complete analysis to support your explanation.
6. If we have to review unsolicited information, or receive an incomplete bank reconciliation, or you do not fully explain variances, this may incur additional costs for which we will make a charge.
7. Make sure that your accounting statements add up the balance carried forward from the previous year (Box 7 of 2024) equals the balance brought forward in the current year (Box 1 of 2025).

Completed – subject to RFO and Joint Committee approval, not to be met requirements		Box
All sections	All red boxes have been completed?	✓
	All information has been sent with this return?	✓
Section 1	For any statement to which the response is 'no', an explanation is provided?	✓
Section 2	Approval by the body confirmed by the signature of Chair of meeting approving the accounting standards?	✓
	An explanation of significant variations from last year to this year is provided?	✓
	Bank reconciliation as at 31 March 2025 agrees to Box 8?	✓
	An explanation of any difference between Box 7 and Box 8 is provided?	✓
Section 4	All red boxes completed by internal audit and explanations provided?	✓

## Appendix 5 – Annual Internal Audit Report:

# Internal Audit – Assurance Report PATROL (Parking and Traffic Regulations Outside London) 2024/25

Report Status: Final  
Report Date: 10th June 2025  
Prepared by: Lucy Draper

Working for a **brighter future** together



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## Distribution List and Version Control

*Draft reports should not be shared with anyone outside of the distribution list below without prior approval from the Audit Manager.*

### **Distribution List – Draft Report:**

- Laura Padden – PATROL, Director
- Erica Maslen – PATROL, Central Services Manager

*Final reports should not be shared with anyone outside of the distribution list without prior approval from the Audit Manager and Final Report Owner.*

### **Distribution List – Final Report:**

- Laura Padden – PATROL, Director
- Erica Maslen – PATROL, Central Services Manager
- Ashley Hughes - Executive Director of Resources, Section 151 Officer

### **Final Report Owner:**

- Laura Padden – PATROL, Director

### **Version Control**

Version Number	Date	Changes
1.0	03.06.2025	Draft report prepared
1.1	04.06.2025	Report reviewed by Acting Principal Auditor
1.2	10.06.2025	Report approved by Head of Audit, Risk and Assurance

## Executive Summary

### 1. Background

1.1 PATROL (Parking and Traffic Regulations Outside London) has been established to enable councils undertaking civil parking enforcement in England and Wales and civil bus lane and moving traffic enforcement in Wales to exercise their functions under:

- Section 81 of the Traffic Management Act 2004 (TMA) and Regulations 17 and 18 of The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 (the English General Regulations).
- Section 81 of the TMA and Regulations 16 and 17 of the Civil Enforcement of Road Traffic Contraventions (General Provisions) Wales Regulations 2013 (the Welsh General Provisions Regulations).
- Regulations 12 and 13 of The Road User Charging (RUCA) Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013 (the Road User Charging Regulations).
- Regulation 18 of The Littering from Vehicles Outside London (Keepers: Civil Penalties) Regulations 2018.

1.2 These functions are exercised through PATROL in accordance with Regulation 16 of the English General Regulations and Regulation 15 of the Welsh General Provisions Regulations.

1.3 The Bus Lane Adjudication Service Joint Committee (BLASJC) was established to enable councils in England undertaking civil enforcement of bus lanes to exercise their functions under Regulation 11 of The Bus Lane Contraventions (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2005 (the Bus Lane Regulations).

1.4 Until March 2023, these functions were exercised through BLASJC in accordance with Regulation 12 of the Bus Lane Regulations. However, legislation was introduced to transfer the bus lane enforcement regime outside London from the Transport Act 2000 to the bus lane enforcement provisions in the Part 2 of Schedule 8 of the 2004 Act. Meaning there was no longer a requirement for a separate Bus Lane Adjudication Service Joint Committee or Bus Lane Adjudication Service Joint Committee Executive Sub Committee.

1.5 Under the above legislation and regulations, councils operating civil traffic enforcement functions are responsible for funding the provision of adjudication. The councils carry out this duty through a Joint Committee.

1.6 The PATROL Adjudication Joint Committee performs this function in accordance with legislation and regulations and the constituent authorities of the Joint Committee defray expenses in such a proportion as the Joint Committee decides.

1.7 The Traffic Penalty Tribunal also provides adjudication in respect of penalties issued for failure to pay the road user



## Executive Summary

charge at the Dartford-Thurrock River Crossing, the Mersey Gateway Bridge and the Durham Road User Charge Zone and in relation to Clean Air Zones, Moving Traffic offences and Littering from Vehicles penalty notices.

- 1.8 PATROL is classed as a small relevant body in accordance with the Accounts and Audit Regulations 2015, and prior to 2015/16 had to complete a Small Bodies Annual Return (SBAR) summarising their annual activities at the end of each financial year. This requirement was removed in 2015/16 by the Accounts and Audit Regulations 2015; however, the Body has decided to complete the SBAR on an annual basis as good practice and in the spirit of openness and transparency.
- 1.9 Cheshire East Council was appointed as the Host Authority to the PATROL Adjudication Joint Committee and Bus Lane Adjudication Joint Committee on 1 January 2013. As part of this role, the Council has delivered the Body's Internal Audit service.
- 1.10 Where reference is made to policies and procedures in this report, these are PATROL's, not Cheshire East Council's unless specified otherwise.

### 2. Scope of Review and Risks Covered

- 2.1. PATROL staff moved to Home Based contracts following the COVID pandemic with staff operating under home working agreements. As such, Internal Audit has carried out the programme of testing remotely and placed reliance on information being supplied electronically.

- 2.2. In order to complete Section 4 of the 2024/25 SBAR, we had to determine whether the 10 stated internal control objectives have been achieved throughout the 2024/25 financial year to a standard adequate to meet the needs of the Body. The control objectives are:

- A. Appropriate accounting records have been kept properly throughout the year.
- B. The Joint Committee's financial regulations have been met, payments were approved and VAT appropriately accounted for.
- C. The Joint Committee assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.
- D. The annual taxation or levy or funding requirements resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.
- E. Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.
- F. Petty cash payments were properly supported by receipts, expenditure was approved and VAT appropriately accounted for.
- G. Salaries to employees and allowances to members were paid in accordance with body approvals, and PAYE and NI requirements were properly applied.
- H. Asset and investment registers were complete and accurate and properly maintained.
- I. Periodic and year-end bank account reconciliations were properly carried out.

## Executive Summary

- J. Accounting statements prepared during the year were prepared on the correct accounting basis, agreed to the cash book, were supported by an adequate audit trail from underlying records, and where appropriate, debtors and creditors properly recorded.
- 2.3. To satisfy the above control objectives, we carried out a programme of audit testing on the following areas:
- Assets
  - Banking and Cheques
  - Budgetary Control
  - Income
  - Payroll
  - Procurement
  - Purchase Cards
  - Risk Management
- 2.4 PATROL did not operate a petty cash/imprest system during 2024/25 (Control F on the SBAR). However, they do have seven purchase cards linked to their bank account. As such, and as per the testing carried out in previous years, a review of processes and controls in operation in relation to the cards was undertaken.
- 2.5 Where sample testing was undertaken, sampling was proportionate to the volume of transactions in relation to the PATROL, Bus Lanes, RUCA, Clean Air Zones, moving traffic and littering. Furthermore, the samples selected included transactions completed throughout the whole of 2024/25 to ensure that the findings are as comprehensive and reliable as possible and capture an accurate reflection

of the practices in place. Although reasonable assurance can be drawn from these findings it is never possible to give complete assurance that all issues have been uncovered, as we are unable to test every transaction.

- 2.6 This draft has been produced to present our key findings and actions, which are reported on an exception basis. It is issued in order that we may confirm the factual accuracy of the findings and agree recommended actions. A final report will be issued once any recommended actions, along with responsibilities and timescales have been agreed.

### 3. Key Findings and Recommended Actions

- 3.1. A total of 77 controls have been tested covering all areas detailed in the control objectives on the SBAR. This draft report is intended to highlight any areas where improvements are required, either in the control itself or to improve compliance with the controls.
- 3.2. As a result of the testing, no issues were identified during the review and as such, no recommended actions have been raised in this report.

### 4. Conclusion and Opinion

- 4.1. The audit concluded that the 10 control objectives detailed on the 2024/25 SBAR are effectively managed for the PATROL Adjudication Joint Committee. **Appendix A** confirms the results of the audit work as it will be entered on the SBAR.

## Executive Summary

- 4.2. Internal Audit use a formal opinion system, details of which are given in **Appendix B**. Based upon the findings and actions raised, a “Good Assurance” opinion has been given.

### **Good Assurance**

Controls are in place to mitigate against the risks identified in the Terms of Reference. Testing has shown that controls are working effectively and consistently to ensure that key risks are well managed.

## Appendix A – Summary of Results for the Small Bodies Annual Return

Section	Objective	Agreed		
		Yes	No	Not Covered
<b>A</b>	Appropriate accounting records have been kept properly throughout the year	✓		
<b>B</b>	The Joint Committee's financial regulations have been met, payments were approved and VAT appropriately accounted for	✓		
<b>C</b>	The Joint Committee assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these	✓		
<b>D</b>	The annual taxation or levy or funding requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate	✓		
<b>E</b>	Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for	✓		
<b>F</b>	Petty cash payments were properly supported by receipts, expenditure was approved and VAT appropriately accounted for	✓ *		
<b>G</b>	Salaries to employees and allowances to members were paid in accordance with body approvals, and PAYE and NI requirements were properly applied	✓		
<b>H</b>	Asset and investment registers were complete and accurate and properly maintained	✓		
<b>I</b>	Periodic and year-end bank account reconciliations were properly carried out	✓		
<b>J</b>	Accounting statements prepared during the year were prepared on the correct accounting basis, agreed to the cash book, were supported by an adequate audit trail from underlying records, and where appropriate, debtors and creditors properly recorded	✓		

\* PATROL did not operate a petty cash system during 2024/25, however there are seven purchase cards linked to the bank account, therefore, a review of processes and controls in operation in relation to the cards was undertaken.

## Appendix B – Audit Opinion and Priority Rating for Individual Findings

### Audit Opinion

An overall opinion on the control environment will be given on completion of the audit work. This opinion relates **only** to those risks identified or systems tested. Where the audit opinion given is either limited or no assurance, consideration will be given to including those areas in the Annual Governance Statement.

There are four possible opinions: good assurance, satisfactory assurance, limited assurance, and no assurance.

The following table explains the various assurance levels in terms of the controls in place and how testing has shown them to be operating. It also gives an indication as to the priority rating of recommendations you might expect at each assurance level, although please note this is for guidance only as the final opinion lies at the discretion of the Auditor.

Assurance Level	Explanation
<b>Good Assurance</b>	Controls are in place to mitigate against the risks identified in the terms of Reference. Testing has shown that controls are working effectively and consistently to ensure that key risks are well managed. No <u>high level</u> recommendations have been made although there may be a small number at medium level. Some changes in the control environment may be beneficial to enhance performance and realise best practice.
<b>Satisfactory Assurance</b>	Controls are adequate to address the risks identified in the terms of reference. Testing has shown that there are some inconsistencies in the application of the controls, and attention is needed to improve the effectiveness of these controls. Recommendations will normally be no higher than medium level.
<b>Limited Assurance</b>	Controls are either not designed to mitigate the risks identified in the terms of reference, or testing has shown there to be significant non-application of controls. There are likely to be <u>a number of</u> high priority recommendations and/or a large number at the medium level. Attention is needed to improve the quality and effectiveness of the control environment <u>in order to</u> ensure key risks can be managed well.
<b>No Assurance</b>	There is an absence of controls to mitigate against the risks identified in the terms of reference. <u>The majority of</u> recommendations made are high priority, and key risks are not being properly managed. Urgent attention is required by management to improve the control environment. This area may be considered for inclusion in the organisation's Annual Governance Statement. It may also be appropriate for this area to be included in the sections/directorate Risk Register, and for the action plan to address these fundamental weaknesses to become part of the Service Delivery Plan.



## Appendix B – Audit Opinion and Priority Rating for Individual Findings

### Priority Rating for Individual Findings

Every audit finding and supporting recommendation will be rated in line with the criteria shown below. Timescales for necessary actions will be discussed with service managers, but the broad expectations for consideration and implementation are outlined below.



Priority	Explanation		
	Risk	Controls and Testing	Timescale
<b>High</b>	<p>Action is required to mitigate against a risk which is assessed as likely to arise, and having a high impact should it do so.</p> <p>A fundamental risk may involve failure to:</p> <ul style="list-style-type: none"> <li>• Meet key business objectives</li> <li>• Meet statutory objectives</li> <li>• Adhere to Cheshire East policies</li> <li>• Prevent fraud or material error</li> </ul>	<p>Controls to mitigate risks identified in the terms of reference are either absent or poorly designed.</p> <p>Testing has shown that controls are significantly failing to work as intended.</p>	<p>This action needs immediate consideration by management.</p> <p>Implementation of necessary actions may take longer, but an action plan to address the issues should be developed immediately.</p>
<b>Medium</b>	<p>Action is required to mitigate against a risk which is assessed as being likely to arise OR having a significant impact if it should arise.</p>	<p>Controls to mitigate risks identified in the terms of reference are in place.</p> <p>Testing has shown that controls are working as intended, with some minor inconsistency.</p>	<p>This action needs to be considered by management within 3 months.</p> <p>Implementation of necessary actions may take longer, but an action plan to address the issues should be developed within 3 months.</p>
<b>Low</b>	<p>Action is required to mitigate against a risk which is assessed as having a low impact or being unlikely to arise.</p> <p>Implementation of these actions will further strengthen internal control and improve potential for achieving best practice.</p>	<p>Controls to mitigate risks identified in the terms of reference are in place.</p> <p>Testing has shown that the controls are being applied consistently and effectively.</p>	<p>This action needs to be considered by management within 6 months.</p> <p>Implementation of necessary actions may take longer, but an action plan to address the issues should be developed within 6 months.</p>



**PATROL Adjudication Joint Committee**

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**Date of Meeting:** 15<sup>th</sup> July 2025

**Report Title:** Budget Monitoring Update for 2025-26

**Report of:** Laura Padden, Director, PATROL

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**1.0 Purpose of Report**

- 1.1** To report the Income and Expenditure position at 31st May 2025 for the year 2025-26 in order to comply with the approved Financial Regulations.
- 1.2** To report the Reserves position at 31st May 2025 against the approved Reserves levels in order to comply with the approved Financial Regulations.

**2.0 Recommendations**

- 2.1** To note the Income and Expenditure position at 31st May 2025 for the year 2025-26.
- 2.2** To note the Reserves position at 31st May 2025 against the approved Reserves levels.

**3.0 Reasons for Recommendations**

- 3.1** To comply with the approved Financial Regulations.
- 3.2** To inform the Risk Register.

**4.0 Background**

- 4.1** At 31st May 2025 Income is £3,463 over budget (positive variance). This is primarily due to late amendments regarding PCN issued numbers from Parking, Moving Traffic and Bus Lane authorities (relating to 2024/25 corrected in 2025/26).

Expenditure is under budget by £80,256 (positive variance).

This results in a surplus to date of £47,617 against a budgeted deficit of £36,103 (a positive variance of £83,719)

Of this £47,617, £94,693 relates to PATROL with the balance being ring- fenced to National Highways (minus £40,105) and Halton Borough Council (minus £6,971).

The detail is provided at **Appendix 1**

SUMMARY TO DATE			
	31/05/2025	31/05/2025	31/05/2025
	Year to Date	Budget	Var to Budget
Income	551,968	548,505	3,463
Expenditure	504,352	584,608	80,256
Surplus / (Deficit)	<b>47,617</b>	<b>-36,103</b>	<b>83,719</b>
<b>Breakdown of Surplus</b>			
PATROL	94,693	-33,458	128,151
Halton Borough Council	-6,971	2,649	-9,620
National Highways	-40,105	-5,293	-34,812
	<b>47,617</b>	<b>-36,103</b>	<b>83,719</b>

#### The savings in expenditure are explained by:

- Savings in Staff Costs due to unfilled vacancies and timing of recruitment
- Savings in Supplies and Services due to and unspent provisions for Legal Costs and Initiatives.
- Savings on Adjudicator Fees due to pending Fee Annual Increment (tied to the MoJ scales).

#### 4.2 Reserves to date are summarised as follows:



	To Date	Budget	Var to Budget
Reserves b/f from 24/25	4,637,104	4,637,104	0
Surplus / (Deficit) for year 25/26 - YTD	47,617	-36,103	83,719
<b>Closing Balance</b>	<b>4,684,721</b>	<b>4,601,002</b>	<b>83,719</b>
<i>Approved Reserves</i>	<i>2,333,708</i>	<i>2,333,708</i>	<i>0</i>
<b>FREE Reserves to Date</b>	<b>2,351,013</b>	<b>2,267,294</b>	<b>83,719</b>
less:			
NH balance to date	41,913		
MG balance to date	31,262		
<b>PATROL FREE Reserves to date</b>	<b>2,277,838</b>		
	0		

At 31st May 2025 there is a Reserves balance of £4,684,721 giving a Free Reserves balance of £2,351,013.

Of this FREE Reserves Balance of £2,351,013, £41,913 is ring-fenced to National Highways and £31,262 ring-fenced to Halton Borough Council. This leaves a balance of FREE Reserves to PATROL of £2,277,838.

## 5.0 Implications

### 5.1. Finance

5.1.1 Assurance of financial health and therefore limited financial risk.

### 6.1 Risk Management

6.1.1 Assurance of financial health and therefore limited financial risk.

## Appendix 1:

	Year to Date					
	31/05/2025	31/05/2025	31/05/2025	31/05/2025	31/05/2024	
	Year to Date	Budget	Var to Budget	Var to Budget	Prior YTD	Var to Current Yr
<b>Income:</b>						
PATROL *	289,324	263,091	26,233	10.0%	258,177	31,147
Bus Lane Income	70,968	78,328	-7,360	-9.4%	80,746	-9,778
Moving Traffic Income	29,962	16,432	13,531	82.3%	9,313	20,649
<b>Road User Charging:</b>						
National Highways - Income	88,686	100,127	-11,441	-11.4%	251,214	-162,528
Halton Borough Council - Income	19,840	26,810	-6,970	-26.0%	25,812	-5,972
Clean Air Zones - Income	32,161	46,695	-14,534	-31.1%	31,368	793
LFV & Durham- Income	292	190	102	53.9%	769	-477
Bank Interest Received	20,538	16,667	3,871	23.2%	22,245	-1,707
Sale of Assets	0	0	0	0.0%	210	-210
Other Income	197	167	31	18.4%	5,700	-5,503
<b>Total Income</b>	<b>551,968</b>	<b>548,505</b>	<b>3,463</b>	<b>0.6%</b>	<b>685,554</b>	<b>-133,586</b>
<b>Expenditure:</b>						
Adjudicators	161,880	184,503	22,623	12.3%	137,761	-24,119
Staff	213,637	248,987	35,350	14.2%	210,376	-3,261
Premises / Accommodation	13,663	14,927	1,263	8.5%	13,459	-204
Transport	3,840	3,917	76	1.9%	4,449	609
Supplies and Services	23,386	47,017	23,631	50.3%	16,079	-7,307
IT	73,842	74,897	1,055	1.4%	59,339	-14,503
Services Management and Support	10,173	9,801	-372	-3.8%	10,173	-0
Audit Fees	560	560	0	0.0%	-875	-1,435
Bad Debts - movement on provision	3,370	0	-3,370	0.0%	-5,405	-8,775
<b>Total Expenditure</b>	<b>504,352</b>	<b>584,608</b>	<b>80,256</b>	<b>13.7%</b>	<b>445,356</b>	<b>-58,996</b>
<b>Surplus / (Deficit)</b>	<b>47,617</b>	<b>-36,103</b>	<b>83,719</b>		<b>240,198</b>	<b>-192,581</b>
		-0			0	0
<b>Breakdown of Surplus</b>	<b>47,617</b>	<b>-36,103</b>	<b>83,719</b>	<b>-231.9%</b>	<b>240,198</b>	<b>-192,581</b>
PATROL *	94,693	-33,458	128,151	-383.0%	121,267	-26,574
Halton Borough Council	-6,971	2,649	-9,620	-363.2%	10,354	-17,325
National Highways	-40,105	-5,293	-34,812	657.7%	108,577	-148,682

## PATROL Adjudication Joint Committee

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**Date of Meeting:** 15<sup>th</sup> July 2025

**Report Title:** Expenditure Falling outside of the Financial Regulations

**Report of:** Laura Padden, Director, PATROL

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### 1.0 Purpose of Report

1.1 To report any expenditure falling outside of the Financial Regulations 2024/25.

### 2.0 Recommendations

2.1 To note the report at **Appendix 1**.

### 3.0 Reasons for Recommendations

3.1 To comply with the Financial Regulations.

### 4.0 Background and Options

4.1 The PATROL Adjudication Joint Committee approved the Financial Regulations and the Scheme of Financial Delegations 2024/25 at its meeting on 9<sup>th</sup> July 2024.

4.2 The Scheme of Financial Delegations sets out (under section 2) that:

*The following limits apply to the approval of submission of tenders; acceptance of tenders; post contract negotiations; agreeing variations and lease, hire or rental agreements.*

<i>Up to £2,000</i>	<i>a written quotation submitted by the requisitioner and authorised by the Budget Manager</i>
<i>Between £2,000 and £30,000</i>	<i>three written quotations submitted against an outline specification by the Budget Manager</i>

£30,000 to £172,514 (EU threshold)	<i>formal tender process to at least three candidates authorised by the Director</i>
EU threshold to £250,000	<i>follow EU tender rules initiated by the Director</i>

**4.3** There may be occasions when it is not practical, or in the best interest of the Joint Committee, to obtain 3 quotes for expenditure for between £2,000 and £30,000.

**4.4** The Financial Regulations (section 1.7) and Scheme of Financial Delegations allow that 3 quotes need not be obtained, but that the Director will report this to the Joint Committee as follows:

*The Director can allow exceptions to these Regulations if it is believed that the best interests of the Joint Committee would be served if the Regulations were not applied. A written record of these decisions must be kept and reported to the Joint Committee at the next available meeting.*

## **5.0 Implications**

### **5.1 Finance**

**5.1.1** Compliance with approved procedures and controls.

### **6.1 Legal Implications**

**6.1.1** None.

### **7.1 Risk Management**

**7.1.1** Financial resilience is monitored within the Risk Management Strategy.

## Appendix 1:

### Expenditure Falling Outside the Scheme of Financial Delegations - Financial Year 24/25: 01/04/24 to 31/03/25

Supplier	Financial Year 24-25	Comment
1	211,655.81	Knowledge Base - System development
2	97,985.75	Knowledge Base (IT Support)
3	59,567.63	Specialist communications consultancy.
4	52,203.32	Landlord
5	39,938.75	Temp Resource and Recruitment. Best candidates.
6	31,184.50	Ongoing commitment - server hosting (IT). Previously known as Melbourne Hosting
7	15,145.92	Data Storage - ongoing commitment
8	12,459.13	Network provision and Support - ongoing
9	9,990.25	Outward postage
10	9,512.32	Ongoing contract - Market Survey done
11	8,772.29	Award Winner - Driving Improvement Awards
12	8,396.19	Award Winner - Driving Improvement Awards
13	8,363.62	On Line Customer Service Tool
14	6,605.25	Recruiter with preferred candidate
15	6,600.00	Ongoing Commitment - PC Phone System
16	5,608.79	PO boxes / Outgoing Mail
17	5,341.86	2 factor security for FOAM
18	5,339.88	Reporting Tool
19	5,305.00	Preferred Venue
20	4,942.92	Preferred venue - Workshop
21	4,858.80	Recruiter with preferred candidate
22	4,830.43	Mobile Comms - all staff
23	4,814.24	Travel to workshops etc, best price sought
24	4,705.99	HR database and time recording system
25	4,318.11	Online centralised booking for travel.
26	3,925.38	IT ticket management and workload planning
27	3,824.01	Preferred Venue for Hotel Stays - London and Other
28	3,660.00	Preferred venue - Workshop
29	3,360.00	External Audit - Allocated
30	3,322.00	Preferred venue
31	2,736.00	Knowledge Base (IT support)
32	2,728.18	OnLine training for staff
33	2,264.00	Knowledge Base (IT Support)
34	2,171.54	Energy Supplier
35	2,127.08	Staff Training

\* supplier names are hidden due to commercial sensitivity

## PATROL Adjudication Joint Committee

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<b>Date of Meeting:</b>	15 <sup>th</sup> July 2025
<b>Report Title:</b>	Risk Management
<b>Report of:</b>	Laura Padden, Director, PATROL

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### 1.0 Purpose of Report

- 1.1 To provide councillors with a summary of the most significant threats facing the Joint Committee which may prevent or assist with the achievement of its objectives.

### 2.0 Recommendation

- 2.1 To note the current assessment of risk which is attached as appendix one to this report.

### 3.0 Reasons for Recommendation

- 3.1 To report on arrangements for identifying, managing and reporting risk.

### 4.0 Background

- 4.1 It is the role of the Joint Committee or its Executive Sub Committee to review the risk management documentation at each meeting. This review aims to provide assurance on the adequacy of the risk for the organisation. Risk management is not about being risk averse, it is about effectively managing risks that could affect the achievement of objectives and ensuring that an appropriate risk culture is in place.
- 4.2 A risk is concerned with a threat, or a possible future event, which will adversely or beneficially affect the Joint Committee's ability to achieve its objectives. Risk management is central to good governance and is all about people making the best decision at all levels within the organisation.
- 4.3 A strong risk register and framework:

- Strengthens governance effectiveness
- Provides a focusing mechanism
- Balances the scale of risk and reward
- Enables better decision making

**4.4** The Joint Committee summarises its risk appetite as follows:

*“We will avoid risks that threaten our ability to undertake our principal objectives in a way that provides quality and value. We will maintain a sufficient level of reserves to support liquidity and absorb short-term fluctuations in income and expenditure beyond our control.”*

There are presently 5 threats on the Corporate Risk Register. These are currently measured as being “low” or “medium” scale risks. The classification of risk is set out below.

**Risk Matrix**

		Consequence				
		5	4	3	2	1
Likelihood	5	25	20	15	10	5
	4	20	16	12	8	4
	3	15	12	9	6	3
	2	10	8	6	4	2
	1	5	4	3	2	1

**4.5** Background to Corporate Risks:

**4.6** Local authorities who undertake civil parking and bus lane enforcement are required by statute to make provision for independent adjudication. The relationship between the adjudicators and the Joint Committee is derived from and governed by the Traffic Management Act 2004.

**4.7** The main function of the Joint Committee is to provide resources to support independent adjudicators and their staff who together comprise the Traffic Penalty Tribunal. The tribunal’s appeal streams include:

- Parking
- Bus Lanes
- Moving Traffic
- Road User Charging (Dartford-Thurrock River Crossing, Mersey Gateway Bridge Crossing and Charging Clean Air Zones)
- Littering from vehicles

**4.8** The objectives of PATROL include:

- a) A fair adjudication service for Appellants including visible independence of adjudicators from the authorities in whose areas they are working.
- b) Consistency in access to adjudication.
- c) A cost effective and equitable adjudication service for all Parking Authorities and Bus Lane authorities in England and Wales.
- d) Flexibility to deal with a wide range of local authorities with varying levels of demand for adjudication.

The relationship between the adjudicators and the PATROL Adjudication Joint Committee is underpinned by a Memorandum of Understanding. The overriding principle of this memorandum is that the adjudicators are independent judicial office holders exercising a judicial function.

- 4.9** The adjudicators and the Joint Committee is committed to a fair adjudication service for appellants including visible independence of adjudicators from the authorities in whose area they are working.
- 4.10** The Director is responsible for coordinating the review of the Risk Management documentation with input from the Senior Management Team.
- 4.11** Following this scrutiny, risk levels are reported to the PATROL Committee or its Executive Sub Committee. The risk management documentation was reviewed in April 2025 by the Director and the Senior Management Team where several amendments were made to the wording within the controls section of the risk register. One amendment of particular importance was that Risk No. CR3, now included reference to the Cyber Security Risk Register, alongside phishing simulations and additional cyber security training. These amendments do not impact on the rating for each risk which continue to remain unchanged from when the Joint Committee last reviewed the register and the framework.
- 4.12** Additional assurance is provided by Internal and External Audit. PATROL is not required to prepare and publish audited accounts but does so to promote transparency.

## **5.0 Implications**

### **5.1 Finance**

- 5.1.1** As reported within this report and financial reports on the agenda.

### **6.1 Risk Management**

- 6.1.1** As detailed in the risk management documentation.



Risk Register 2025/2026 - Reviewed April 2025													
Risk No.	Risk	Risk Description including impact	Risk Owner(s)	Inherent Likelihood	Inherent Impact	Inherent Rating	Risk Accepted	Direction	Controls	Inherent Likelihood	Inherent Impact	Residual Rating	Comments
CR1	Inability to meet demand for service	(Cause) The tribunal provides a statutory function which is available to all vehicle owners who receive a Notice of Rejection of Representations in respect of specified penalties. (Threat) the tribunal is unable to meet its statutory obligations (impact) appellants are unable to appeal penalties.	Chief Adjudicator and Stakeholder Engagement & Systems Manager	1	3	3	Yes	→	This rating remains unchanged. The tribunal has a fully scalable online system and a flexible adjudicator and staffing model. The online process is complimented by assisted digital support for appellants who are unable to make their appeal online. The tribunal continues to refine and develop the online system in response to user feedback. Since the recruitment of adjudicators from London to the Traffic Penalty Tribunal, we have a number of adjudicators that have retired or moved on to full time positions. We are currently considering options for the recruitment of adjudicators in either 25/26 or 26/27 to restore the number of available adjudicators to optimum operating levels.	1	3	3	No further action
CR2	Lack of Financial Resilience	(Cause)The basis for defraying Joint Committee expenses is based on variable rather than fixed charges. This means that the Joint Committee must manage unforeseen significant fluctuations in either Income or Costs such that (threat) Reserves are significantly eroded and (impact) financial obligations cannot be met.	Director and Central Services Manager	1	5	5	Yes	→	This rating remains unchanged. The reserves levels have now been restored to their minimum threshold. We continue to strictly monitor income and expenditure and in the light of the decision to reduce the PCN charge without a negative impact on our operations; however, we will continue to keep our monitoring and controls in place and be reactive to any fluctuations.	1	5	5	No further action
CR3	Loss of Data Confidentiality, Integrity & Availability (C,I,A)	(Cause) The Tribunal operates an on-line appeal system to improve the quality and flexibility for tribunal users. Support systems are also underpinned by a range of technologies. With this deployment of technologies, the risk of security breaches increases. This could result in the inability of IT to support the needs of the organization and users such that (threat) the statutory service is not accessible to all and (impact) appeals cannot be adjudicated online.  Potential breach of General Data Protection Regulations 2016 and Data Protection Act 2018.	Director and Stakeholder Engagement & Systems Manager	3	3	9	Yes	→	This rating remains unchanged. A range of digital security monitoring features, data management procedures and training are regularly deployed in accordance with GDPR and DPA 2018. These measures have been reviewed in light of homeworking. We have also created a dedicated, full-time role for the monitoring of cyber security and data protection, as well as the addition of a Cyber Security Risk Register, phishing simulations and additional cyber security training. The hosting of the appeal system has transferred from the EU to UK.	3	3	9	No further action
CR4	Lack of Resource Planning	(Cause) Insufficient adjudicator or staff resources to support the needs of the organisation such that (threat) the organisation is unable to meet its statutory obligations and (impact) the quality or timeliness of the adjudication process, administrative standards or the achievement of development objectives compromised.	Chief Adjudicator and Director	2	2	4	Yes	→	This rating remains unchanged in the light of reduced appeals since the pandemic. We have now completed a mini restructure and filled the outstanding staff vacancies that we were carrying for the implementation of moving traffic regulations and their associated appeals. Ongoing monitoring of caseload and volumes to assess and regularly review capacity. Some recent and forthcoming departures of adjudicators may require a recruitment campaign to ensure that adjudicator numbers remain stable and recruitment options are currently being considered.	2	2	4	No further action
CR5	Lack of preparation for business continuity	(Cause) that an internal or external incident occurs which renders the organisation unable to utilise part or all of its infrastructure such that (impact) the organisation is unable to deliver some or all of its services resulting in (impact) reduced accessibility to our service.	Central Services Manager and Stakeholder Engagement & Systems Manager	1	4	4	Yes	→	This risk remains unchanged. A detailed DR plan to mitigate risk is held and reviewed each year and planned technology upgrades have taken place to further support business continuity. This is accessible to all managers and has clearly defined responsibilities.	1	4	4	No further action

Impact Levels	Impact	Definition
<b>0</b>	There is no impact on the organisation	Loss of service for > 30 Minutes
<b>1</b>	There is a minimal impact on the organisation	Loss of service for > 2 Hours
<b>2</b>	There is a minor impact on the organisation	Loss of service for > 8 Hours
<b>3</b>	There is a moderate impact on the organisation	Loss of service for > 1 Day
<b>4</b>	There is a serious impact on the organisation	Loss of service for > 3 Days
<b>5</b>	There is a severe impact on the organisation	Loss of service for > 7 Days
Likelihood Levels		Definition
<b>0</b>	Never	0% chance of successful exercise of threat during a one-year period
<b>1</b>	Rare	1% chance of successful exercise of threat during a one-year period
<b>2</b>	Unlikely	2% - 5% chance of successful exercise of threat during a one-year period
<b>3</b>	Possible	5% - 10% chance of successful exercise of threat during a one-year period
<b>4</b>	Likely	10% - 25% chance of successful exercise of threat during a one-year period
<b>5</b>	Very Likely	> 25% chance of successful exercise of threat during a one-year period
Risk Levels = Impact Level x Likelihood Level	Definition	
<b>0</b>	No risk	
<b>1 - 4</b>	Very low risk	
<b>5 - 9</b>	Low risk	
<b>10 - 14</b>	Medium risk	
<b>15 - 20</b>	High risk	
<b>21 - 25</b>	Critical risk	

## PATROL Adjudication Joint Committee

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<b>Date of Meeting:</b>	15 <sup>th</sup> July 2025
<b>Report Title:</b>	Establishment of the Executive Sub Committee
<b>Report of:</b>	Sarah Baxter, Democratic Services and Policy Manager

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### 1.0 Purpose of Report

- 1.1 This report sets out arrangements for the Joint Committee to establish an Executive Sub Committee and its Terms of Reference for the coming year.

### 2.0 Recommendations

- 2.1 That the Joint Committee establishes an Executive Sub Committee to act on behalf of the Committee until its annual meeting in July 2026, and that it appoints members of the Executive Sub Committee for the forthcoming year.
- 2.2 Reviews and approves the Terms of Reference of the Executive Sub Committee attached as appendix one to the report.
- 2.3 Notes the date of the meetings of the Executive Sub Committee to be held on 14<sup>th</sup> October 2025 and 20<sup>th</sup> January 2026.

### 3.0 Reasons for Recommendations

- 3.1 To enable the Joint Committee to conduct their business effectively.

### 4.0 Background

- 4.1 Members are aware that as each Council becomes a party to the PATROL Adjudication Service Joint Committee Agreement it is required to appoint a member to represent their Council on the Joint Committee, however within the terms of reference of the Joint Committee there is also the ability to establish an Executive Sub Committee.
- 4.2 Many of the day-to-day functions of the Joint Committee have already been delegated to officers. Those functions that have not been delegated have been

examined and it is felt that if the Joint Committee decides, an Executive Sub-Committee could deal with a significant number of these non-delegated functions without the need for the full Committee to meet again.

- 4.3** Any terms of reference for such Sub Committees need to be agreed by the Joint Committee as and when each Sub Committee is established.
- 4.4** The functions recommended by officers for delegation to the Executive Sub-Committee is detailed in the Appendix to this report.
- 4.5** The size of the Executive Sub Committee is recommended by officers to comprise a minimum of 8 in number for PATROL, including the Chair of the Joint Committee and at least one each representing District, County, Unitary, Metropolitan councils and at least one from an English authority and one from a Welsh authority.

## **5.0 Implications**

### **5.1 Legal**

- 5.1.1** The PATROL Adjudication Joint Committee agreement makes provision for the establishment of sub committees.

### **6.1 Risk Management**

- 6.1.1** The recommendations enable the Joint Committee to conduct its business effectively.

### **7.1 Financial**

- 7.1.1** The recommendations reduce expenditure for the Joint Committee and the participating authorities.

## **APPENDIX ONE**

### **PATROL ADJUDICATION SERVICE JOINT COMMITTEE Executive Sub Committee - Terms of Reference**

Delegation of the following functions to the PATROLAJC Executive Sub-Committee:

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#### **1. Financial Matters**

- (a) Deciding on the level and proportion PATROLAJC member Councils shall contribute to the costs and expenses of the adjudication service.
- (b) Establishing and adopting not later than 31st January in each year a budget of estimated expenditure for the ensuing year commencing 1st April and approving accounts for the previous financial year by 30<sup>th</sup> June each year.
- (c) Accepting tenders for the supply of goods, services, materials, equipment, building and civil engineering works in excess of £250,000 per contract.
- (e) All financial matters not delegated to officers under the Joint Committee's Financial Regulations.
- (f) Reviewing the Joint Committee's Reserves Policy Statement and Risk Register.

#### **2. Human Resources**

- (a) Approving changes above grade PO6 (SCP49) to the staff assignment, except for Adjudicator appointments. This may be delegated to the Advisory Board.
- (b) Subject to the approval of the Lead Authority to consider applications for early retirement where there would be a financial cost to the PATROLAJC. This may be delegated to the Advisory Board.

#### **3. Advisory Board**

Making additional appointments to or amending existing appointments to the Advisory Board.

#### **4. New Council members to the PATROLAJC Agreement**

Noting new council members.

#### **5. Ad hoc delegations**

The Joint Committee may from time to time make specific delegations to the Executive Sub Committee to progress business. The results of such delegations will be reported to the Joint Committee at its next meeting. The Executive Sub Committee may from time-to-time delegate actions to the Advisory Board.

#### **6. Chair of the Executive Sub Committee**

The chair elected for the Joint Committee will assume the same position on the Executive Sub Committee.



## PATROL Adjudication Joint Committee

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<b>Date of Meeting:</b>	15 <sup>th</sup> July 2025
<b>Report Title:</b>	The Winners of the Driving Improvement Awards 2024-Update
<b>Report of:</b>	Sarah Baxter, Democratic Services and Policy Manager

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### 1.0 Purpose of Report

- 1.1 To update members of the Joint Committee on how Brighton & Hove City Council and North Essex Parking Partnership (the winners of the Driving Improvement Awards 2024) utilised the £25,000 funding which was allocated to deliver their awareness campaigns focused on the subject of 'Abuse of Civil Enforcement Officers'.

### 2.0 Recommendation

- 2.1 To note the report.

### 3.0 Reasons for Recommendation

- 3.1 As part of the Driving Improvement Awards process, a report on the progress and outcomes of each campaign is presented to the Joint Committee for information.

### 4.0 Background

- 4.1 The Driving Improvement Awards was launched in 2024, replacing the PACER awards (previously known as the PARC awards) which began in 2008/09. While the PACER awards had successfully encouraged the production of high-quality annual reports that engaged the public with the details, purposes and objectives of traffic management and enforcement, officers at PATROL felt that the PACER Awards had achieved its objectives, and we could do more to

support local authorities in tackling national issues that affect enforcement authorities and their staff.

- 4.2** In collaboration with members of the Advisory Board, the Driving Improvement Awards were launched in January 2024. Funding for the innovative scheme was drawn from PATROL's existing budget for innovation and research, with a maximum of £25,000 available to the successful bidder(s). Officers hoped the Driving Improvement Awards would provide an opportunity for councils (whose members sat on the Joint Committee) alongside relevant organisations to submit funding proposals for initiatives or campaign activities aimed at enhancing service delivery, creating an education tool for the public as well as promoting positive change and strong community engagement.
- 4.3** The 2024 theme proposed by the Director of PATROL, Laura Padden, and supported by the PATROL's Advisory Board, focused on the abuse of Civil Enforcement Officers. Board members agreed that CEO abuse had significantly increased over the years, making it an appropriate time to ask councils to produce a campaign educating the public on this serious issue. The Driving Improvement Awards were officially launched in January 2024 with councils invited to submit bids for campaigns related to the announced theme.
- 4.4** At the end of April 2024, submitted bids were reviewed by the PATROL team and a shortlist of potential winners was drawn up. The final decision on the winners was made by the awards reviewing panel. At the inaugural event in July 2024, Brighton & Hove City Council and North Essex Parking Partnership were announced as joint winners.
- 4.5** Both Brighton and NEPP worked closely with officers from PATROL prior to the launch of their campaigns in January 2025. As the campaigns gained momentum, with considerable local and national media interest, regular meetings were held to discuss how the final evaluation of the campaigns' impact could be reported to the Joint Committee.
- 4.6** The winners have been invited to attend PATROL's annual reception at Church House which is held shortly after the Joint Committee meeting. Here both authorities will be able to present their campaigns to the Joint Committee and the winner(s) of the 2025 theme 'Misuse of Blue Badges' will also be announced.
- 4.7** Appendices one and two, attached to this report provide comprehensive and detailed accounts of each campaign, written by officers from Brighton & Hove City Council and North Essex Parking Partnership.

## **5.0 Implications**

### **5.1 Finance**

- 5.1.1** The cost of the campaigns was met from PATROL's existing budget.

### **6.1 Risk Management**

- 6.1.1** None.



## **7.1 Legal**

**7.1.1** Successful bids to be accordance with the terms and conditions of the scheme.

# Driving Improvement Award Summary

Brighton & Hove City Council  
Beyond the Uniform Campaign  
May 2025



## 1. Overview

In July 2024, the parking enforcement team at Brighton & Hove City Council received funding from PATROL (Parking and Traffic Regulations Outside London) in connection with The Driving Improvement Award to create an impactful campaign addressing the abuse faced by Civil Enforcement Officers. This initiative, which secured joint winner status alongside the North Essex Parking Partnership (NEPP), was commended for its “creative and thought-provoking” approach to educating the public about the essential work of parking officers.

The campaign launched on 21st January 2025 in close collaboration with our Parking Enforcement providers NSL. BHCC took a staggered approach to releasing materials throughout the pilot period which ended on 31st March 2025.

### Current Situation

Code yellow incidents involving verbal attacks and aggressive behaviour saw a 109.5% increase, rising from 21 cases in 2023 to 44 cases in 2024.

Code red classifies physical attacks, defined as any form of intentional physical contact, these incidents rose by 28.6%, from 14 cases in 2023 to 18 cases in 2024.

In 2024, NSL reported that 53% of the abuse directed at Civil Enforcement Officers occurred independently of their involvement in issuing Penalty Charge Notices or monitoring parked vehicles. This finding confirms hostility towards officers is not solely linked to enforcement actions but is a broader issue tied to the role itself.

## 2. Campaign Activity

### Artwork and Branding

The campaign placed a strong emphasis on branding. Brighton & Hove City Council and the North Essex Parking Partnership (NEPP) jointly agreed that the title “Beyond the Uniform” effectively captured the campaign’s objectives. NEPP produced striking artwork that featured the campaign logo, an educational message, and personal insights into the lives of Parking Officers beyond their professional roles. To ensure the materials were suitable for national use, references to uniforms were removed and the term “Civil Enforcement Officer” was replaced with “Parking Officer”, allowing the campaign to resonate across the wider industry.

### Film

A central element of Brighton & Hove City Council’s bid was the production of a short, documentary-style film. The concept combined insights into the personal lives of Parking Officers

with real-life accounts of their experiences on street. The film aimed to educate the public, challenge common misconceptions, and highlight the vital role these officers play in keeping cities moving. It concluded with a call to action, encouraging viewers to “take a moment to recognise their efforts.”

## **Website and Communications Plan**

It was essential to establish a central reference point for all campaign-related activity. Dedicated webpages were created on the Council’s website to support the initiative, with a strong emphasis on educational content and promotion of the valuable work carried out by CEO’s within the community. These pages were published in conjunction with the campaign launch.

To amplify the launch of both the website and the film, the Council utilised its social media platforms X, Facebook, and Instagram, to raise awareness. A communications plan was developed with the aim of humanising officers, myth busting, and highlighting the critical role they play in keeping the city moving. The content was tailored to engage residents, visitors, and businesses alike.

## **TV and Media**

The campaign launch was well received and generated significant media interest. ITV Meridian featured a dedicated segment the day after the launch, which included interviews with the Parking Officers featured in the film, as well as positive interactions with members of the public. Additional coverage followed from the BBC and local press outlets, further amplifying the campaign’s reach and impact.

## **Albion Stadium video play**

Brighton & Hove is home to the Premier League football club, Brighton & Hove Albion FC (BHAFC). A dedicated Match Day parking scheme is in place to manage traffic in the vicinity of the stadium, which is actively enforced by CEO’s. As part of the campaign outreach, the Council approached the football club to seek their support. The club responded positively and agreed to screen a 30-second campaign film clip on their matchday display boards during half-time intervals, beginning on 14th February.

## **Street Advertising**

It was important to ensure that campaign advertising appeared in locations where parking enforcement delivers the greatest benefit. This included high-traffic areas such as the city centre, where unmanaged parking can disrupt traffic flow, and at bus stops, which must remain clear to ensure public transport operates efficiently. The Council was able to utilise existing advertising contracts for BT hubs and bus shelters, enabling the campaign to be promoted in these key locations from mid-February through to the end of the pilot period.

## Vehicle Wraps

To extend the campaign’s presence on the streets, our contractors applied branded wraps to two patrol cars and a van, launched in late February.

The designs featured campaign artwork on the rear windows, showcasing character illustrations and a message encouraging respect for staff. The side panels displayed the “Beyond the Uniform” branding alongside the logos of both the Council and the contractor, ensuring clear and consistent visibility of the campaign message.

## Local Press Advertising

The Council was keen to ensure the campaign was supported by positive local media coverage. The Argus, Sussex’s largest publication, has historically featured parking-related stories that have attracted negative feedback. We arranged a front-page wraparound advert for 21st March, complemented by digital ‘waterfall’ advertising on their website.

### 3. Financials

Film	£5,662.29
Argus Advert	£1,800.00
Vehicle Wraps	£1,310.00
<b>Total</b>	<b>£8,772.29</b>

### 4. Outcomes

#### Film and Website

In line with GDPR requirements, we are only able to track website users who have consented to the use of cookies. Efforts are ongoing to optimise our cookie consent banners to encourage greater uptake. Current Google Analytics data indicates a 70% engagement rate for the press release and a 65% engagement rate for the dedicated campaign webpage:

The film is hosted on the Council’s official YouTube channel. The full 10-minute version has received over 600 views to date, which is consistent with engagement levels for similar Council productions. It is anticipated that viewership will increase as the campaign is rolled out nationally.

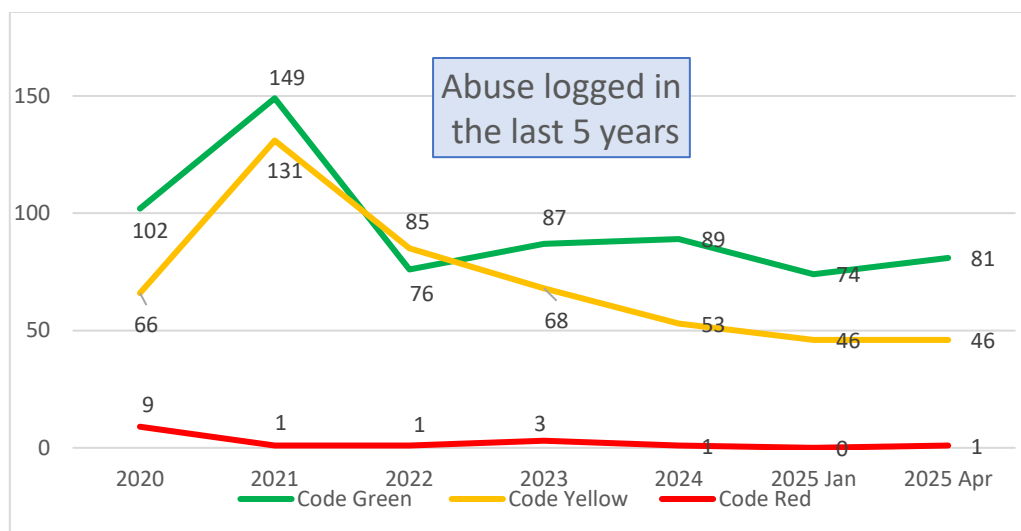
## Social Media

The campaign was promoted through non-sponsored social media posts, with all key information included directly in the content. As most posts did not require users to click through for further details, engagement rates may appear lower than actual reach.

	Facebook	X (Twitter)
Total impressions	6,753	3,267
Average engagement rate	2.71%	1.5%

The campaign posts achieved strong visibility, generating over 10,000 impressions across the Council's social media platforms.

## Statistics



**\*The figures for codes vary from the annual reporting as this is focused on all incidents which occur in a month. While not all incidents are reported by Civil Enforcement Officers, this report focuses specifically on those that have been logged, which accounts for the variation.**

**\*Code green indicates a mild abusive comment, code yellow indicates more severity which includes direct threats, and code red is where a physical altercation has unfortunately taken place.**

As part of this initiative, data collection was carried out at the start of the campaign in January 2025 and again in April 2025 following the pilot phase. As anticipated, the data from this period did not yet show measurable impact from the campaign, likely due to seasonal factors and the limited timeframe for behavioural change to take effect. Quarterly monitoring will continue, with future reporting also capturing instances of positive feedback, such as expressions of thanks.

## Additional Impacts

**Contractor Contributions:** Civil Enforcement Officer morale remained high throughout the campaign, supported by active involvement in campaign activities and recognition initiatives.

**Police Engagement:** Ongoing discussions with Sussex Police have focused on improving outcomes in response to incidents involving Parking Officers.

**Research and Best Practice:** We are engaging with other local authorities to share learning and identify best practice in tackling abuse against enforcement officers.

**Public Recognition:** The service has received increased public praise for the work of Civil Enforcement Officers. This has included biscuits and thank-you cards from residents in areas affected by persistent parking issues.

**Independent Media Coverage:** On 25th April, local press independently published a news article highlighting the abuse Civil Enforcement Officers experience.

## 5. Summary

This project has been both insightful and valuable, and we extend our gratitude to PATROL for shedding light on the challenges faced by frontline enforcement staff. The pilot has demonstrated the importance of reinforcing positive messaging and providing accurate information to shift public perception and reduce negativity. Education and myth busting play a crucial role in ensuring parking officers are recognised for their broader contributions, rather than being perceived solely as revenue generators. As the campaign expands nationally, it will be essential for local authorities and all parking operators to support its implementation, ensuring the necessary reach for long term impact.

Brighton & Hove City Council remains committed to ongoing information campaigns and the promotion of the campaign assets. We will be engaging with the local football club to feature the campaign logo in match brochures for the upcoming season, and we are exploring collaborations with NEPP to establish a best practice network focused on this important subject.

Looking ahead, we will continue to work closely with our enforcement contractors to develop annual action plans to improve public understanding of parking regulations while aligning with their Social Value commitments. Partnerships with the Police will be maintained to reinforce positive outcomes. Future enforcement contracts will include dedicated marketing budgets to sustain promotional activities to ensure the campaign's longevity.

We believe by improving public awareness and promoting a more informed dialogue, it will benefit the parking industry and Civil Enforcement Officers will receive the recognition they deserve. Through continued collaboration and education, we are confident this initiative will make a lasting difference

# Driving Improvement Award Final Report

Brighton & Hove City Council  
Beyond the Uniform Campaign  
May 2025





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Outcomes	Page 9
Summary	Page 12

## 1. Overview

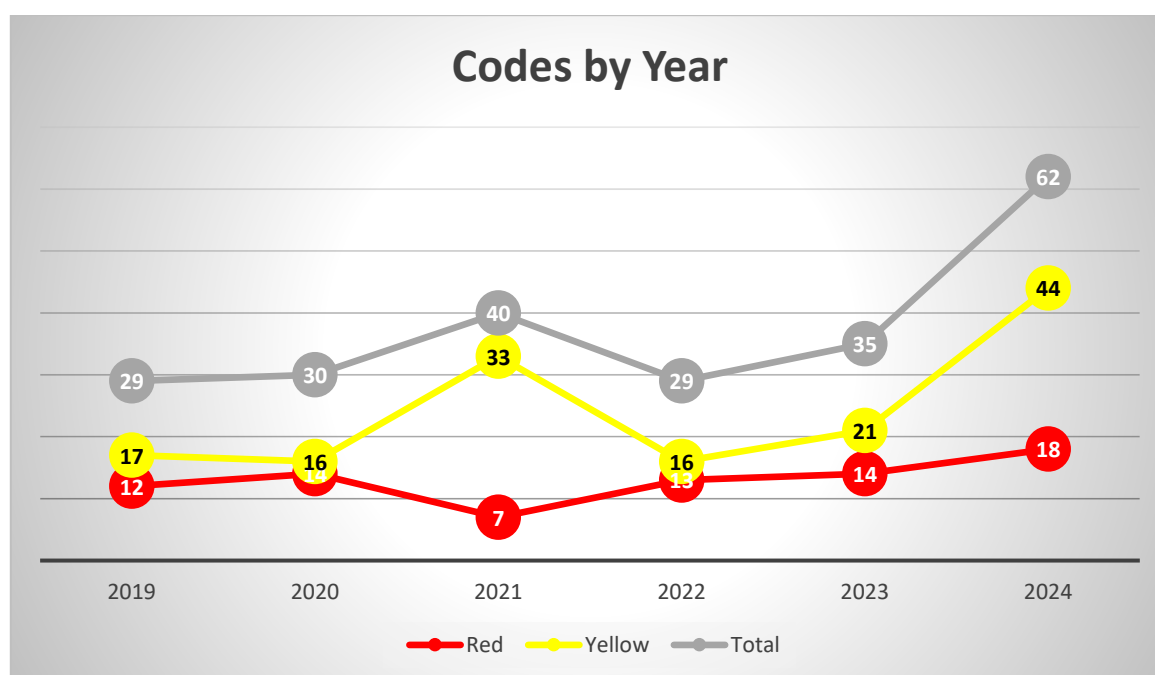
In July 2024, the parking enforcement team at Brighton & Hove City Council received funding from PATROL (Parking and Traffic Regulations Outside London) in connection with The Driving Improvement Award to create an impactful campaign addressing the abuse faced by Civil Enforcement Officers. This initiative, which secured joint winner status alongside the North Essex Parking Partnership (NEPP), was commended for its “creative and thought-provoking” approach to educating the public about the essential work of parking officers.

Brighton & Hove City Councils campaign aims to promote a more accurate and respectful public perception of Civil Enforcement Officers by humanising their role. Through strategic use of media outlets, the initiative seeks to educate the public on the essential nature of their work, dispelling misconceptions that contribute to unnecessary hostility. By clarifying their responsibilities and emphasising their positive impact on the community, the campaign aspires to reduce negative sentiment, encourage cooperation, and cultivate greater public respect.

The campaign launched on 21st January 2025 in close collaboration with our Parking Enforcement providers NSL. BHCC took a staggered approach to releasing materials throughout the pilot period which ended on 31st March 2025.

### Current Situation

Our parking enforcement contractors NSL have been monitoring abuse activity since 2019. The chart below focuses on the number of incidents that have occurred each year:



The yellow line represents verbal attacks, including profanity, aggressive behaviour, and personal threats, such as wishing harm upon the individual or their family. These incidents saw a 109.5% increase, rising from 21 cases in 2023 to 44 cases in 2024.

The red line illustrates physical attacks, defined as any form of intentional physical contact. While the increase was more modest, these incidents still rose by 28.6%, from 14 cases in 2023 to 18 cases in 2024.

In 2024, NSL reported that 53% of the abuse directed at Civil Enforcement Officers occurred independently of their involvement in issuing Penalty Charge Notices or monitoring parked vehicles. This finding confirms hostility towards officers is not solely linked to enforcement actions but is a broader issue tied to the role itself.

We will be measuring the success of the campaign by collating statistics in line with the campaign launch to see if there is a reduction in the levels of parking officer abuse. This has been expanded to include 'code green' reporting which includes general insults.

## 2. Campaign Activity

### Artwork and Branding

The campaign placed a strong emphasis on branding. Brighton & Hove City Council and the North Essex Parking Partnership (NEPP) jointly agreed that the title "Beyond the Uniform" effectively captured the campaign's objectives. NEPP produced striking artwork that featured the campaign logo, an educational message, and personal insights into the lives of Parking Officers beyond their professional roles. To ensure the materials were suitable for national use, references to uniforms were removed and the term "Civil Enforcement Officer" was replaced with "Parking Officer", allowing the campaign to resonate across the wider industry.



## Film

A central element of Brighton & Hove City Council's bid was the production of a short, documentary-style film. The concept combined insights into the personal lives of Parking Officers with real-life accounts of their experiences on street. The film aimed to educate the public, challenge common misconceptions, and highlight the vital role these officers play in keeping cities moving. It concluded with a call to action, encouraging viewers to "take a moment to recognise their efforts."

The film was brought to life through the contributions of CEO's Stef, Lumi, and Finn, whose participation was instrumental in its success. It was officially launched via a press release on 21st January, marking the beginning of the campaign.

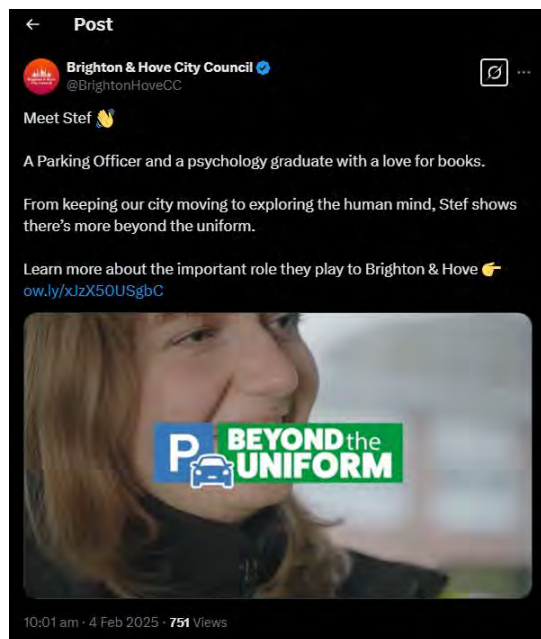


## Website and Communications Plan

It was essential to establish a central reference point for all campaign-related activity. Dedicated [Webpages](#) were created on the Council's website to support the initiative, with a strong emphasis on educational content and promotion of the valuable work carried out by CEO's within the community. These pages were published in conjunction with the campaign launch.

To amplify the launch of both the website and the film, the Council utilised its social media platforms X, Facebook, and Instagram, to raise awareness. A communications plan was developed

with the aim of humanising officers, myth busting, and highlighting the critical role they play in keeping the city moving. The content was tailored to engage residents, visitors, and businesses alike.



Week one of the Social Media plan focused on building anticipation and introducing the Beyond the Uniform campaign with a strong focus on the film. Shorter edits were put together to promote the messaging.

The following weeks were focused on reinforcement of the messaging:

*Meet Tony 🙋 Tony is a husband, a painter and a Parking Officer. He helps keep roads clear for bin lorries to get through.*

*Next time you see a member of the team, take a moment to recognise their efforts.*

*Learn more about how we're improving parking across the city 🗨 [Brighton & Hove City Council's Parking Services page]*

## TV and Media

The campaign launch was well received and generated significant media interest. ITV Meridian featured a dedicated segment the day after the launch, which included interviews with the Parking Officers featured in the film, as well as positive interactions with members of the public. Additional coverage followed from the BBC and local press outlets, further amplifying the campaign's reach and impact.

## Albion Football Stadium



Brighton & Hove is home to the Premier League football club, Brighton & Hove Albion FC (BHAFC). A dedicated Match Day parking scheme is in place to manage traffic in the vicinity of the stadium, which is actively enforced by CEO's.

As part of the campaign outreach, the Council approached the football club to seek their support. The club responded positively and agreed to screen a 30-second campaign film clip on their matchday display boards during half-time intervals, beginning on 14th February.

With a stadium capacity of 35,000, 28,000 of which are allocated to home supporters, this partnership provided a valuable platform to raise awareness. Securing the club's backing has been a standout achievement of the campaign.



## Street Advertising

It was important to ensure that campaign advertising appeared in locations where parking enforcement delivers the greatest benefit. This included high-traffic areas such as the city centre, where unmanaged parking can disrupt traffic flow, and at bus stops, which must remain clear to ensure public transport operates efficiently.

The Council was able to utilise existing advertising contracts for BT hubs and bus shelters, enabling the campaign to be promoted in these key locations from mid-February through to the end of the pilot period.



## Vehicle Wraps



To extend the campaign's presence on the streets, our contractors applied branded wraps to two patrol cars and a van, launched in late February.

The designs featured campaign artwork on the rear windows, showcasing character illustrations and a message encouraging respect for staff. The side panels displayed the "Beyond the Uniform" branding alongside the logos of both the Council and the contractor, ensuring clear and consistent visibility of the campaign message.

## Local Press Advertising

The Council was keen to ensure the campaign was supported by positive local media coverage. The Argus, Sussex's largest publication, has historically featured parking-related stories that have attracted negative feedback.

To counter this, we arranged a front-page wraparound advert for 21st March, complemented by digital 'waterfall' advertising on their website.



### 3. Financials

The Council received £12,500 in funding to deliver the campaign. A local filmmaker and Brighton Film School colleague was commissioned, bringing both experience and a clear understanding of the brief, enabling the film to be produced within budget. Council and contractor facilities were used to minimise costs, and with contractor support, no additional fees were incurred for officer participation in the film.

Initially, three separate advertising activities were planned with The Argus (local press). However, following early media coverage, this was scaled back to a bespoke package including a printed wraparound and digital 'waterfall' advert. Thanks to the free digital advertising on Bus Stops and BT Hubs, we felt this was sufficient coverage throughout the Pilot period.

Vehicle wrap designs were also simplified from the original proposal to minimise the risk of vandalism which resulted in lower costs.

Film	£5,662.29
Argus Advert	£1,800.00
Vehicle Wraps	£1,310.00
<b>Total</b>	<b>£8,772.29</b>

### 4. Outcomes

#### Film and Website

In line with GDPR requirements, we are only able to track website users who have consented to the use of cookies. Efforts are ongoing to optimise our cookie consent banners to encourage greater uptake. Current Google Analytics data indicates a 70% engagement rate for the press release and a 65% engagement rate for the dedicated campaign webpage:

Date Jan 21, 2025 - Mar 31, 2025			
Free form 1			
Segment	Parking officers content		
Pagetitle	Views	Average session duration	Engagement rate
<b>Totals</b>	<b>188</b> 100% of total	<b>2m 34s</b> Avg 0%	<b>62.34%</b> Avg 0%
1 Beyond the Uniform campaign celebrating and supporting our Parking Officers	100	1m 56s	70.71%
2 Transforming perceptions: Recognising the vital role of parking officers	88	2m 22s	65.12%



The film is hosted on the Council’s official YouTube channel. The full 10-minute version has received over 600 views to date, which is consistent with engagement levels for similar Council productions. It is anticipated that viewership will increase as the campaign is rolled out nationally.

## Social Media

The campaign was promoted through non-sponsored social media posts, with all key information included directly in the content. As most posts did not require users to click through for further details, engagement rates may appear lower than actual reach.

According to the Communications Team, BHCC’s engagement rates consistently exceed government averages, particularly for posts related to collections, major projects, and public consultations.

For context, average engagement rates for government accounts are 2.91% on Facebook and 1.31% on X. The campaign’s performance was in line with these benchmarks, which is considered strong for an informational campaign:

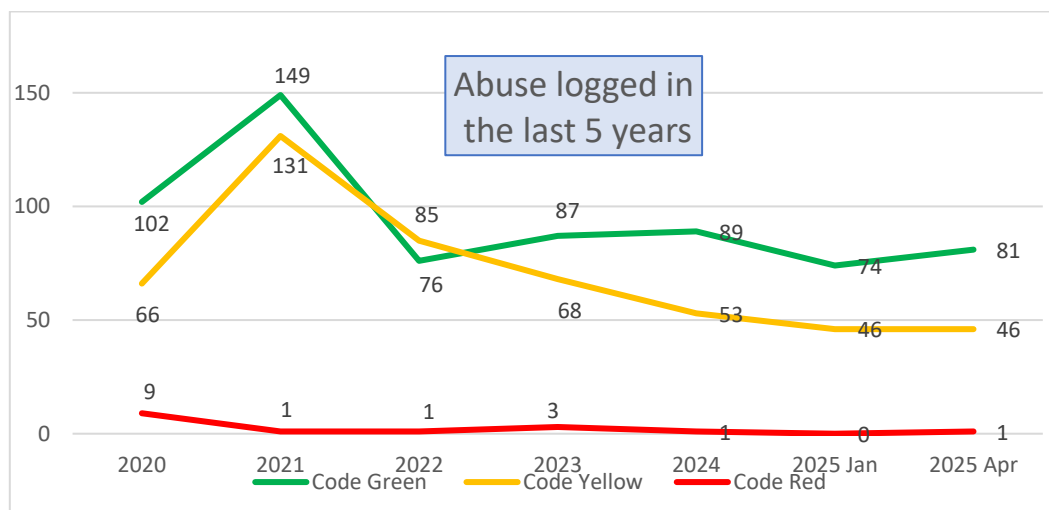
	Facebook	X (Twitter)
Total impressions	6,753	3,267
Average engagement rate	2.71%	1.5%

The campaign posts achieved strong visibility, generating over 10,000 impressions across the Council’s social media platforms.

However, adapting the campaign artwork for various social media formats presented some challenges. The original files were too large to transfer via email and resizing them proved technically difficult. We are grateful to NEPP for their support in hosting the files and assisting with format adjustments to meet our requirements.

## Statistics

Our Enforcement Contractors conduct in depth abuse reporting annually each September:



**\*The figures for codes vary from the annual reporting as this is focused on all incidents which occur in a month. While not all incidents are reported by Civil Enforcement Officers, this report focuses specifically on those that have been logged, which accounts for the variation.**

**\*Code green indicates a mild abusive comment, code yellow indicates more severity which includes direct threats, and code red is where a physical altercation has unfortunately taken place.**

As part of this initiative, data collection was carried out at the start of the campaign in January 2025 and again in April 2025 following the pilot phase. As anticipated, the data from this period did not yet show measurable impact from the campaign, likely due to seasonal factors and the limited timeframe for behavioural change to take effect. Quarterly monitoring will continue, with future reporting also capturing instances of positive feedback, such as expressions of thanks.

The data has nonetheless provided valuable insights into the locations and nature of incidents. The majority occurred in the city centre, which experiences the highest footfall. Notably, incidents were not linked to specific officers, supporting the view that hostility is directed at the uniform rather than the individual. Interestingly, third-party incidents, those unrelated to Penalty Charge Notices, increased to 57% during the campaign period.

## **Additional Impacts**

### **Contractor Contributions:**

Civil Enforcement Officer morale remained high throughout the campaign, supported by active involvement in campaign activities and recognition initiatives. These included letters of commendation from the Council and an 'Employee of the Month' scheme. These practices will continue as part of business as usual to maintain momentum. Additionally, our contractors have actively promoted the campaign at industry events and via LinkedIn, helping to raise awareness across the sector.

### **Police Engagement:**

Ongoing discussions with Sussex Police have focused on improving outcomes in response to incidents involving Parking Officers. These have included meetings to strengthen communication and promote effective partnerships. Progress has been made in resolving several outstanding cases, and the enhanced collaboration has already proven beneficial.

### **Research and Best Practice:**

We are engaging with other local authorities to share learning and identify best practice in tackling abuse against enforcement officers. Discussions with the London Borough of Hackney have been particularly valuable, and we are exploring the adoption of some of their initiatives—such as the introduction of black uniforms, which present a more security-focused appearance and appear to reduce incidents. We are also reviewing relevant legislation to better understand the Council's enforcement options.

## Public Recognition:

The service has received increased public praise for the work of Civil Enforcement Officers. This has included biscuits, and thank-you cards from residents in areas affected by persistent parking issues. Positive feedback has also been noted across social media and local news coverage. In one instance, Sussex Police commended a Parking Officer for their swift and effective response when a member of the public suffered a cardiac arrest.

## Independent Media Coverage:

On 25th April, local press independently published a news article highlighting the abuse Civil Enforcement Officers experience. The piece referenced a previous interview about the campaign and acknowledged the award received. This represents a notable shift in tone from the publication's usual reporting and further demonstrates the campaign's growing recognition: [Dozens of violent incidents reported against Brighton traffic wardens | The Argus](#)

## 5. Summary

This project has been both insightful and valuable, and we extend our gratitude to PATROL for shedding light on the challenges faced by frontline enforcement staff. The pilot has demonstrated the importance of reinforcing positive messaging and providing accurate information to shift public perception and reduce negativity. Education and myth busting play a crucial role in ensuring parking officers are recognised for their broader contributions, rather than being perceived solely as revenue generators. As the campaign expands nationally, it will be essential for local authorities and all parking operators to support its implementation, ensuring the necessary reach for long term impact.

Brighton & Hove City Council remains committed to ongoing information campaigns and the promotion of the campaign assets. We will be engaging with the local football club to feature the campaign logo in match brochures for the upcoming season, and we are exploring collaborations with NEPP to establish a best practice network focused on this important subject.

Looking ahead, we will continue to work closely with our enforcement contractors to develop annual action plans to improve public understanding of parking regulations while aligning with their Social Value commitments. Partnerships with the Police will be maintained to reinforce positive outcomes. Future enforcement contracts will include dedicated marketing budgets to sustain promotional activities to ensure the campaign's longevity.

We believe by improving public awareness and promoting a more informed dialogue, it will benefit the parking industry and Civil Enforcement Officers will receive the recognition they deserve. Through continued collaboration and education, we are confident this initiative will make a lasting difference



# EVALUATION REPORT 2025

## Beyond the Uniform pilot campaign



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1. Executive Summary
2. Introduction
3. Objectives
4. Concept and Design
5. Action Plan
6. Results
7. Responses
8. Partnerships
9. Challenges
10. Next Steps
11. Conclusion





# 1 EXECUTIVE SUMMARY

**Beyond the Uniform was a pilot communications campaign delivered by the North Essex Parking Partnership (NEPP) and funded by Parking and Traffic Regulations Outside London (PATROL's) Driving Improvement Award.**

The NEPP's pilot campaign ran from **21 January to 31 March 2025** in Harlow, Essex. **The campaign aimed to tackle violence and aggression towards Civil Enforcement Officers (CEOs)** by highlighting the issue and humanising staff - shifting focus from enforcement to empathy and community service.

Through a series of digital content, printed materials, media and community events, the campaign introduced the public to individual CEOs, sharing their personal stories, interests and experiences.

These stories were designed to highlight that our staff are real people with real lives - something the public can relate to - which helps foster a greater understanding of the important public-facing role CEOs play in keeping communities safe, accessible, and fair for all road users.

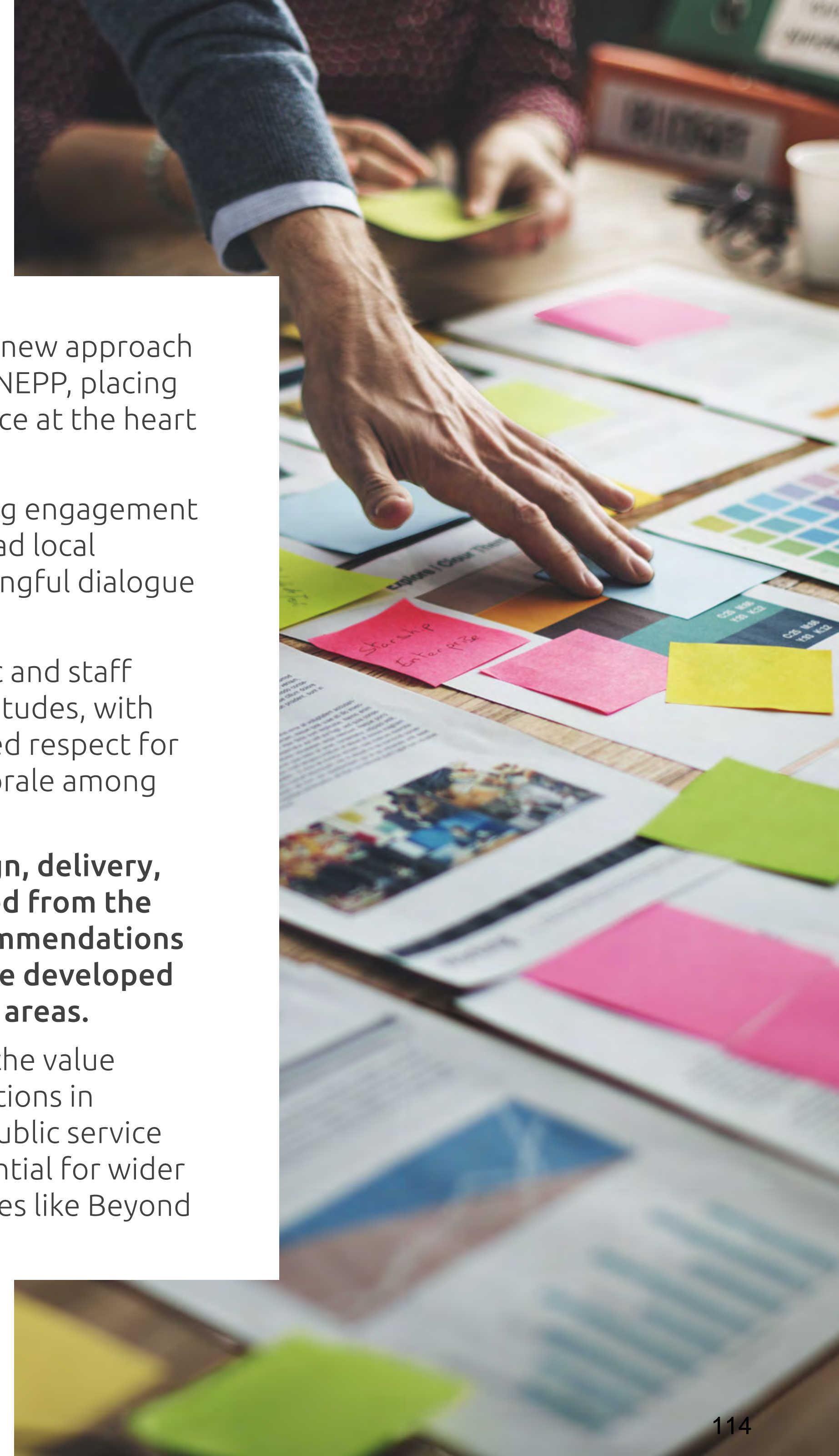
Beyond the Uniform marked a new approach to public engagement for the NEPP, placing storytelling and lived experience at the heart of its communications.

The campaign generated strong engagement on social media, reached a broad local audience and prompted meaningful dialogue within the community.

Feedback from both the public and staff indicated a positive shift in attitudes, with early signs suggesting increased respect for the CEO role and improved morale among staff.

**This report outlines the design, delivery, outcomes, and lessons learned from the campaign, and provides recommendations for how the approach could be developed further or replicated in other areas.**

The evaluation demonstrates the value of human-centred communications in transforming perceptions of public service roles, and underlines the potential for wider sector impact through initiatives like Beyond the Uniform.





# 2 INTRODUCTION

In April 2024, the North Essex Parking Partnership (NEPP) submitted a funding bid for £25,000 to PATROL to support a campaign aimed at tackling violent and aggressive behaviour towards its frontline staff, Civil Enforcement Officers (CEOs).

From January to March 2024, in just three months, NEPP Civil Enforcement Officers recorded **43 violent and aggressive incidents** whilst out on patrol. Of these, 10 were severe enough to report to the Police. **The NEPP takes a zero-tolerance approach towards staff abuse.** Although our officers are trained to handle these situations and are supported after they occur, the number of incidents was increasing, so we wanted to find a way to reduce this.

As part of its funding application, the NEPP proposed piloting a campaign in Harlow, Essex, which, at the time, had the highest level of abusive incidents experienced by NEPP staff.

Harlow is a town located in the west of Essex, covering an area of 12 square miles, with a population of approximately 95,000. Positioned in the heart of the London-Stansted-Cambridge corridor, it also borders the county of Hertfordshire.

Our goal was to launch a campaign that wasn't about parking, but about people – to humanise our officers, celebrate their resilience, and build a community where respect thrives. By fostering respect, understanding, and empathy, we hoped to create a positive shift in perceptions and reduce instances of abuse and negativity.

In July 2024, the NEPP, together with Brighton and Hove City Council, was jointly awarded £25,000 in funding.

The two organisations were asked to collaborate on a single campaign that would act as a pilot, with potential to be expanded nationwide or be developed further in the future.

This campaign would be a transformative initiative – one that bridged the gap between the public and our unsung heroes: the parking officers who diligently serve our communities. Through this work, we hoped to encourage behaviour change and ultimately see a reduction in the number of abusive incidents faced by our staff.





# 3 CAMPAIGN OBJECTIVES

Before developing the creative concept and visual identity for the campaign, we began by considering the core purpose of the campaign - who we were speaking to, what would have the most impact and what we hoped to achieve. From the outset, the campaign was built around four key pillars:

## Shining a Spotlight

At the heart of Beyond the Uniform was a commitment to shine a spotlight on the individuals behind the important roles of CEOs.

## Championing Empathy

By sharing the stories and complex challenges faced by CEOs, we aimed to evoke empathy and promote a deeper understanding of the role beyond the uniform.

## Transforming Perceptions

To challenge the negative stereotypes associated with parking and traffic enforcement, shifting the narrative to one of dedication, professionalism, and humanity. By showing CEOs as individuals with families, aspirations, and strong community values, the campaign reframed how the role is perceived.

## Encouraging Respect

Respect is more than a courtesy - it's a foundation for positive public interaction. Beyond the Uniform encouraged open dialogue, helping to dispel misconceptions and nurture mutual respect between enforcement officers and the communities they serve.





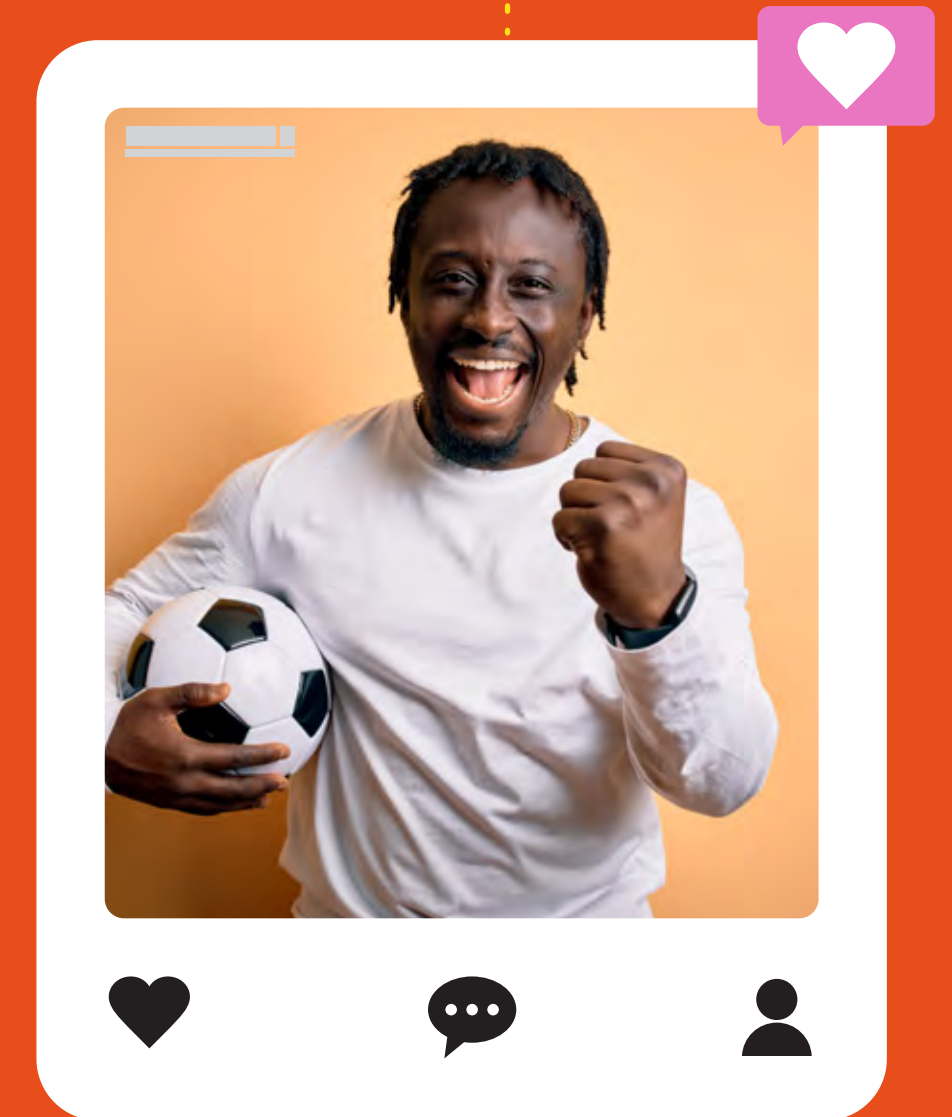
# KEY MESSAGES AND CALLS TO ACTION

To support these four pillars, a series of clear and consistent messages ran throughout the campaign:

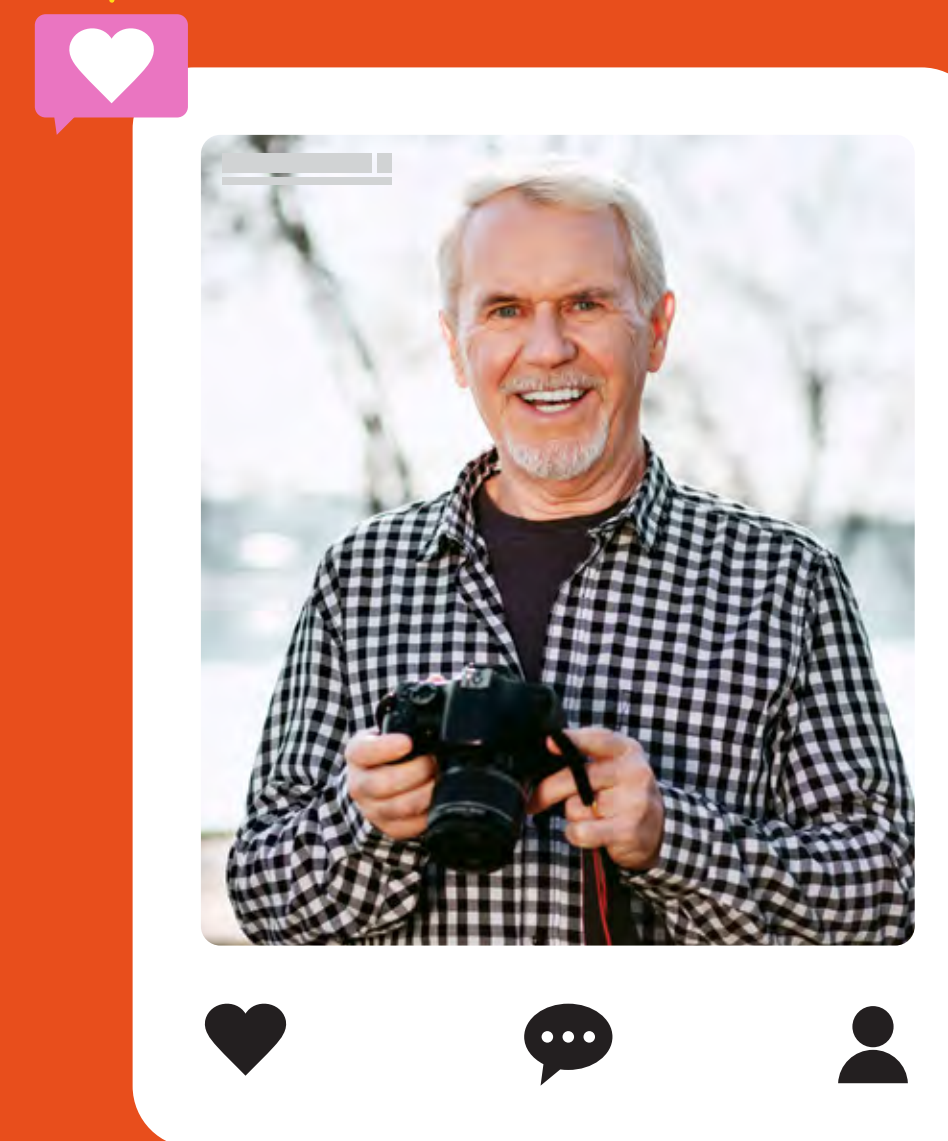
- **Shine a light on the consequences of aggression:** Violent and abusive behaviour towards CEOs has real and lasting impact - emotional distress, physical harm, and, where necessary, police involvement and prosecutions.
- **Highlight the value of the CEO role:** Keeping roads safe, accessible and moving for everyone - emergency services, pedestrians, cyclists, children, wheelchair users, prams, public transport etc.
- **Humanise frontline parking staff:** Officers are people first - parents, grandparents, siblings, friends - carrying out an important and often challenging public duty
- **Prompt reflection:** Encouraging the public to pause and consider the impact of their words and behaviour before interacting with our staff.



Meet Julie, a caring nan with a love for gardening and nurturing beautiful plants.



Meet Mosi, a proud dad and an inspiring kids' football coach.



Meet Sam, a dedicated dog owner with a talent for capturing moments through photography.

# 4 CONCEPT AND DESIGN

Both the NEPP and Brighton and Hove City Council contributed initial concepts and creative ideas of how the campaign could look, feel and function across different formats and platforms.

From the outset, it was important to consider the campaign's long-term potential. PATROL had expressed interest in scaling the concept nationally, so the design needed to be adaptable — suitable for a wide range of local authorities with varying sizes, geographies, demographics, parking provisions, and budgets.

NEPP proposed the concept of 'Beyond the Uniform' for the campaign. This idea encouraged the public to see past the uniform and recognise the individual — emphasising that CEOs are not only enforcement officers, but also community members with personal stories, responsibilities, and values. The uniform itself often becomes a symbol of authority or conflict; the campaign sought to shift that perception and refocus attention on the person behind it.

The creative approach centred on short, powerful, and relatable messages designed to humanise CEOs and highlight the breadth and value of their work.

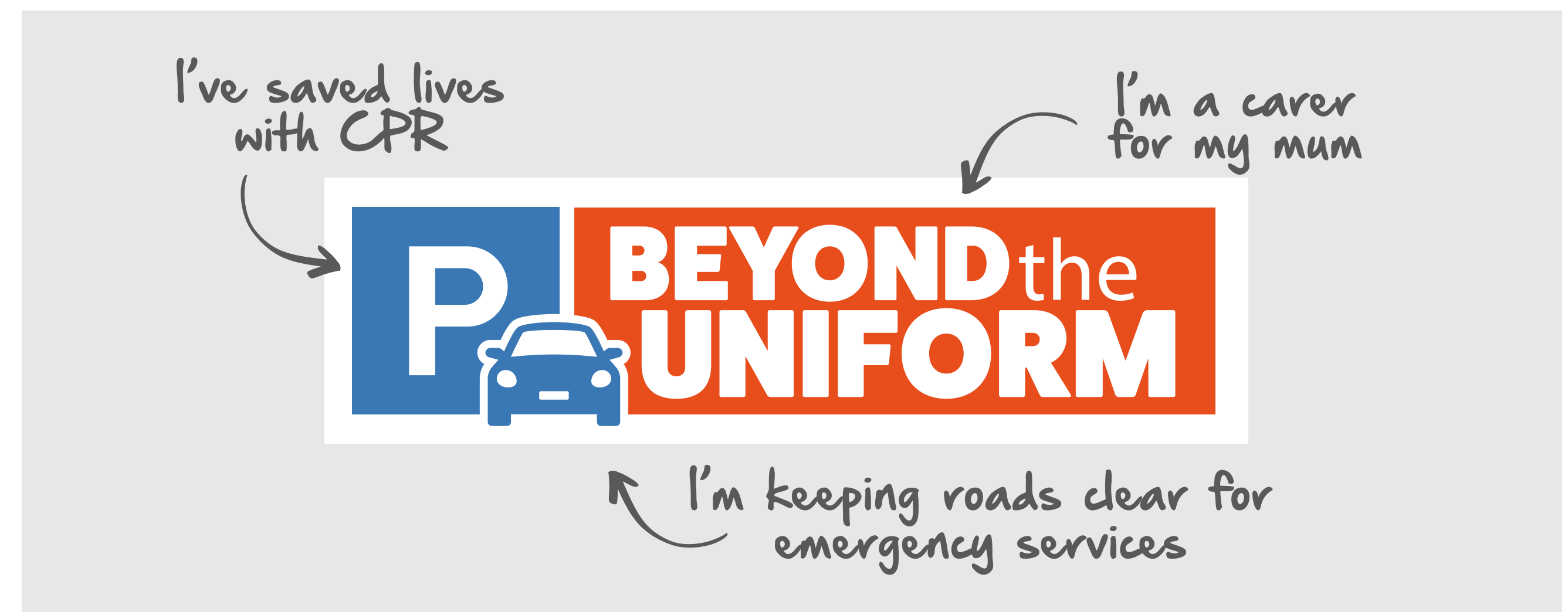
Examples included:

- Beyond the uniform, I'm a carer for my mum.
- Beyond the uniform, I've saved lives with CPR.
- Beyond the uniform, I'm keeping roads clear for emergency services.

For the artwork, we proposed using bright, vibrant materials designed to capture attention and move away from the darker tones typically associated with parking and enforcement. To support

the objective of humanising our staff, NEPP felt it was important to feature imagery of real people and due to photographic permissions, stock imagery of individuals was carefully chosen to reflect and represent the diversity of our workforce.

The campaign design and materials were developed to work effectively across a range of assets, from social media to posters and video content — ensuring clarity, consistency, and emotional impact across all campaign touchpoints.





# 5 ACTION PLAN

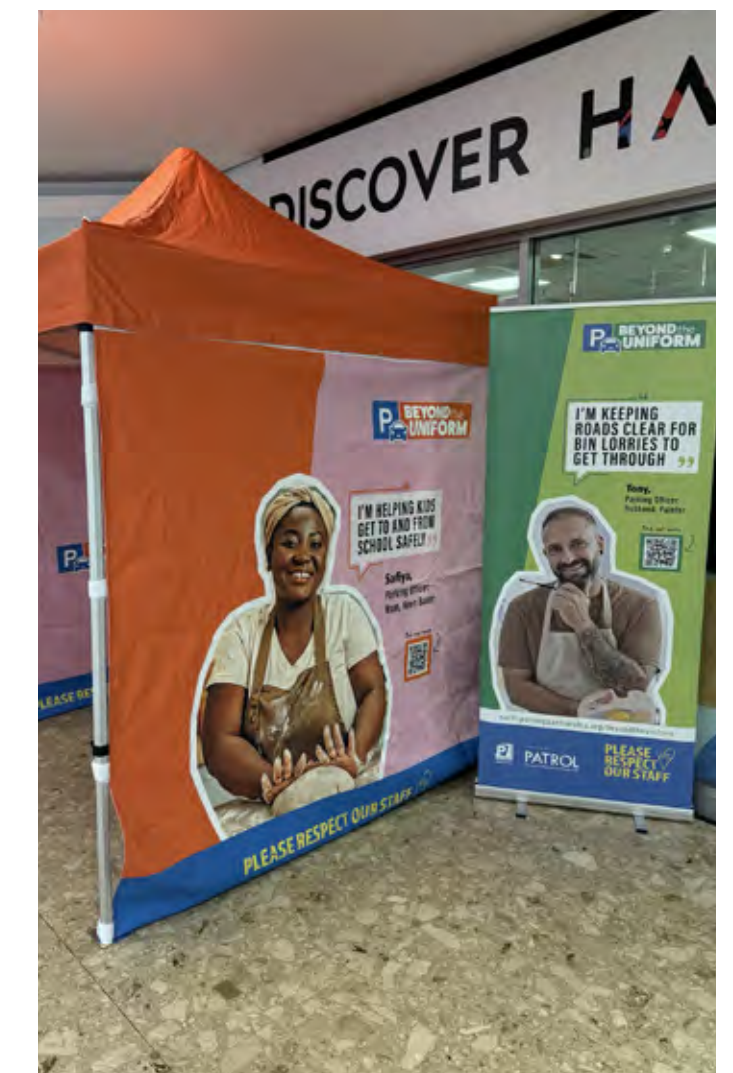
As the Driving Improvement Award was jointly awarded to two organisations and the delivery timescales were significantly condensed, we revisited our original application to assess what could realistically be achieved within a three-month timeframe and a revised budget of £12,500.

Taking into account our local insight, campaign objectives, and the needs of both our frontline staff and the wider organisation, we opted to pilot a blended approach that combined a range of communication and engagement methods. These included:

- Media and Public Relations activity
- Bus advertising
- Organic social media
- Paid social media awareness campaign
- Posters and postcards
- Editorial features
- Use of Harlow Council's communication channels
- Online advertising
- A dedicated campaign webpage
- Email signatures
- Internal communications initiatives, including a staff competition
- Pop-up community engagement events with supporting materials and refreshments

A key component of the campaign was direct community engagement. NEPP staff, including CEOs, attended the pop-up events in Harlow to meet and speak with members of the public. These interactions allowed officers to explain their role, highlight the positive contributions they make to local communities, and share the personal impact of experiencing abuse while on duty.

By featuring real CEOs at these events, the campaign aimed to humanise the individuals beyond the uniform, fostering empathy and greater public understanding. This face-to-face engagement was complemented by a broader print and digital media campaign designed to raise awareness of the issue and promote respect towards parking enforcement officers.





# 6 RESULTS

## Media

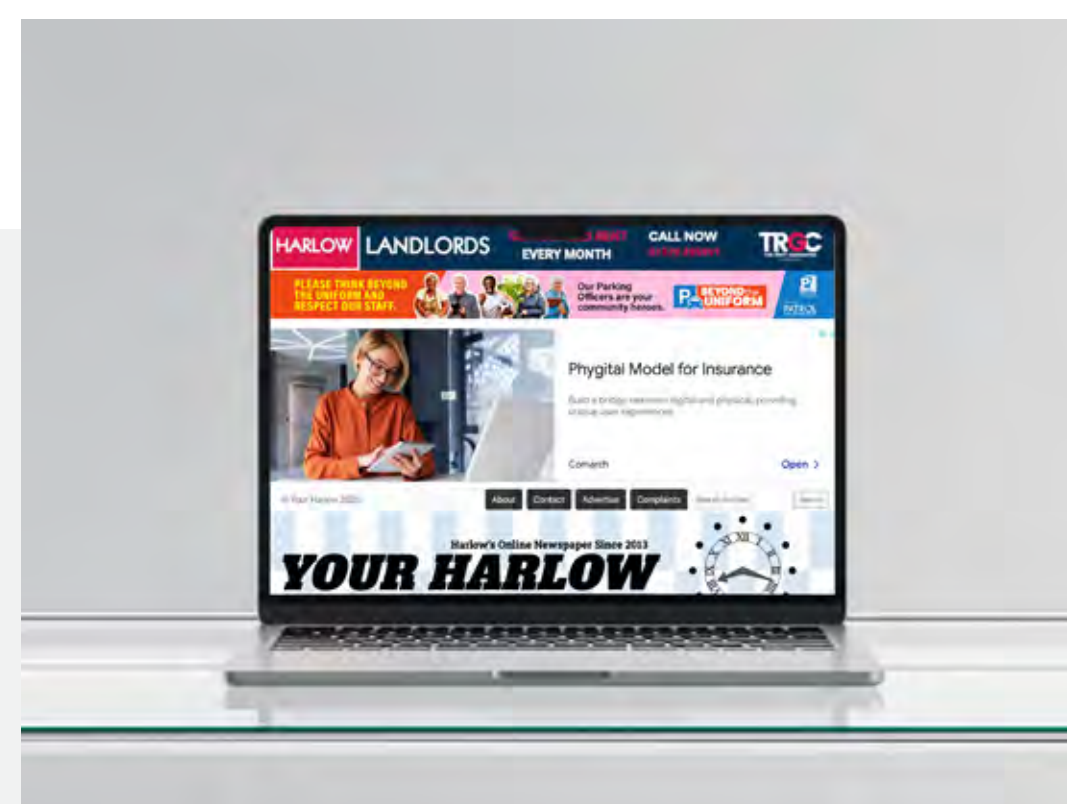
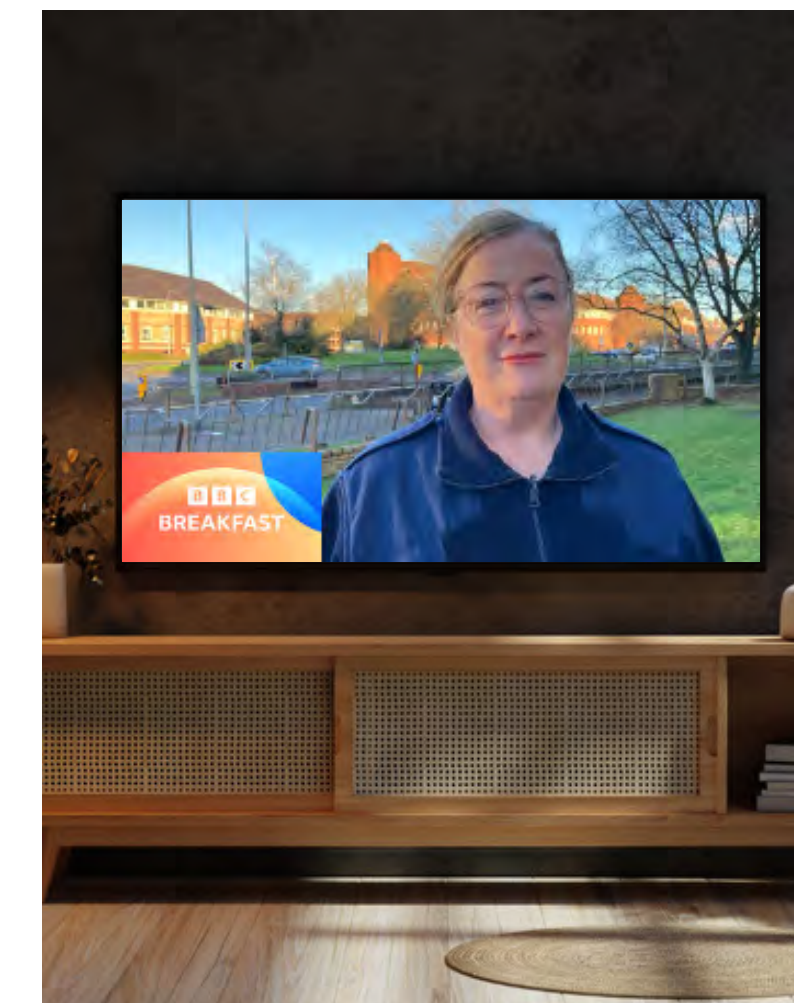
The NEPP experienced an incredible media response to the campaign with 19 media features at local, regional and national level (with more still to come).

The campaign got off to a great start, with pre-recorded interviews with five staff members prepared prior to the launch date and the campaign being BBC Radio Essex's 'Story of the Day' and live interviews in the the studios for their Breakfast show and a social media feature. The BBC then also ran this as their top news story on regional BBC Look East and picked it up on national BBC Breakfast TV, all within the first week!

Media interest and support for the campaign grew very quickly and we secured regional and national TV coverage, county-wide radio, print and digital media outlets, including, but not limited to....

BBC Essex | BBC Look East | BBC Breakfast | Your Harlow | Transport Xtra  
Parking Review | Parking News | Bauer Media | Colchester Gazette | Essex  
County Standard | Halstead Gazette | Clacton and Frinton Gazette

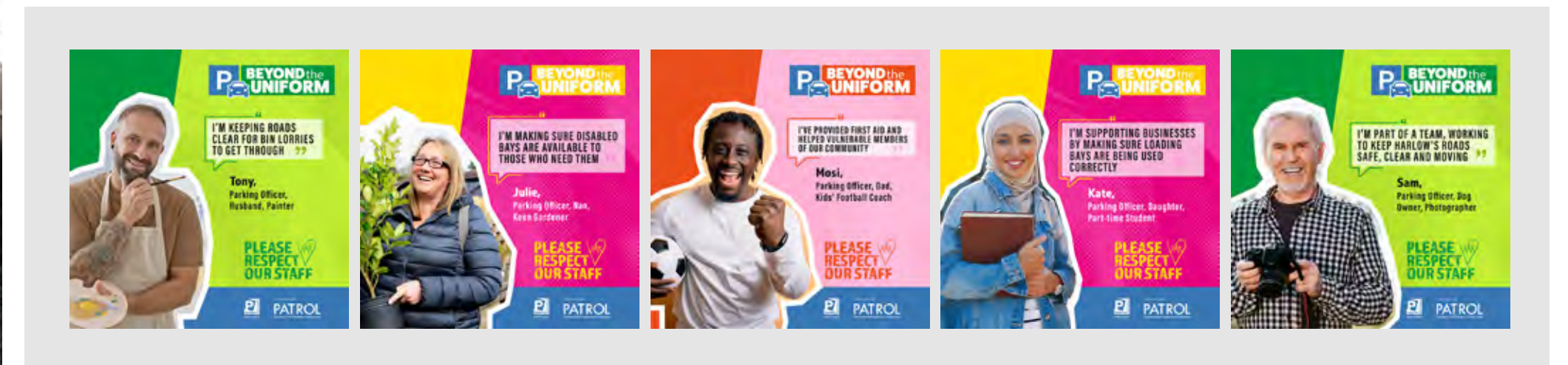
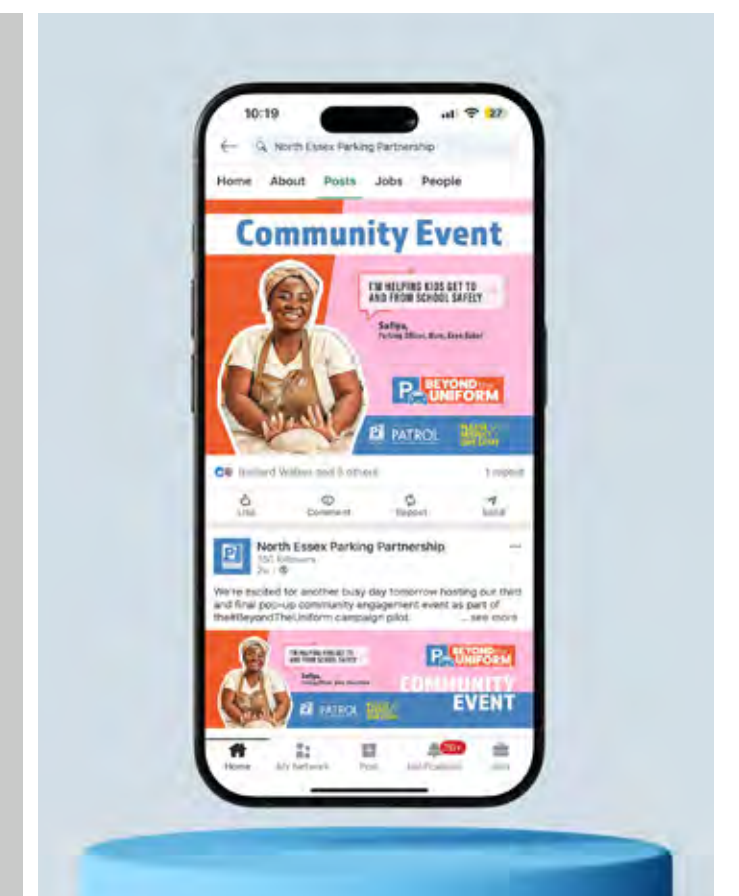
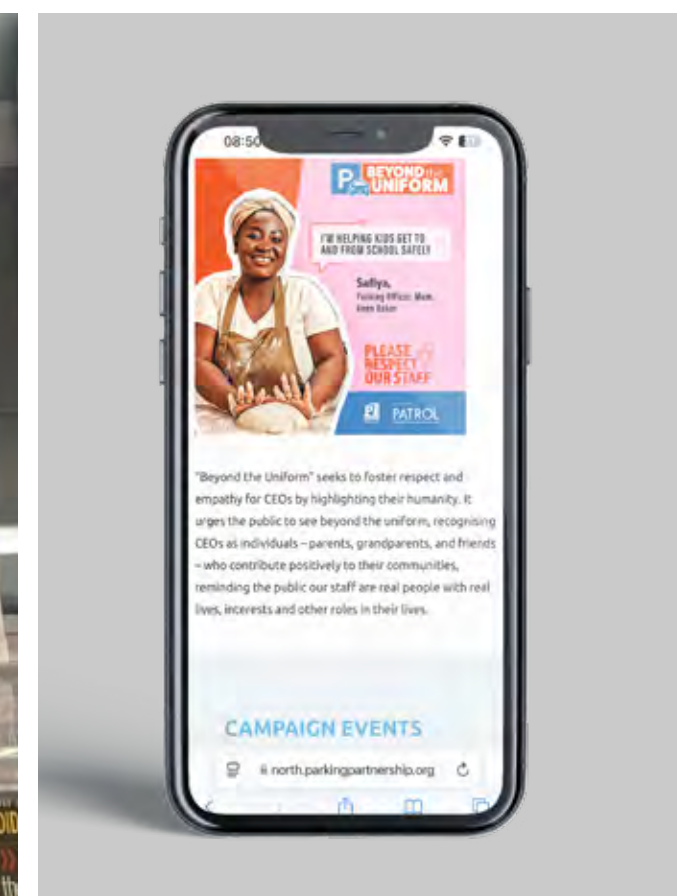
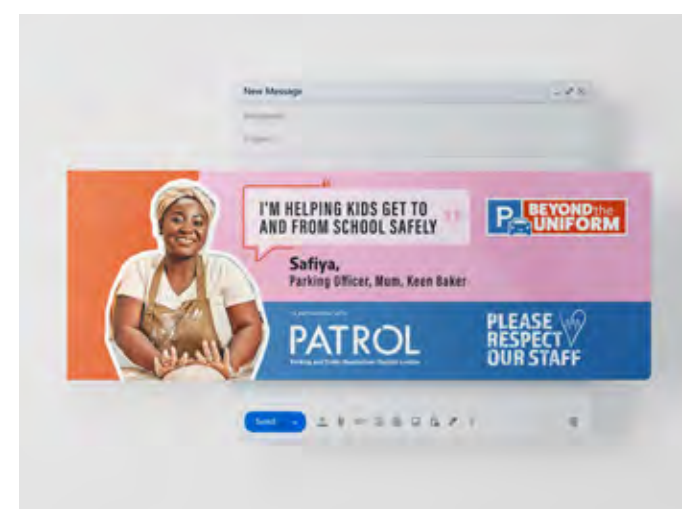
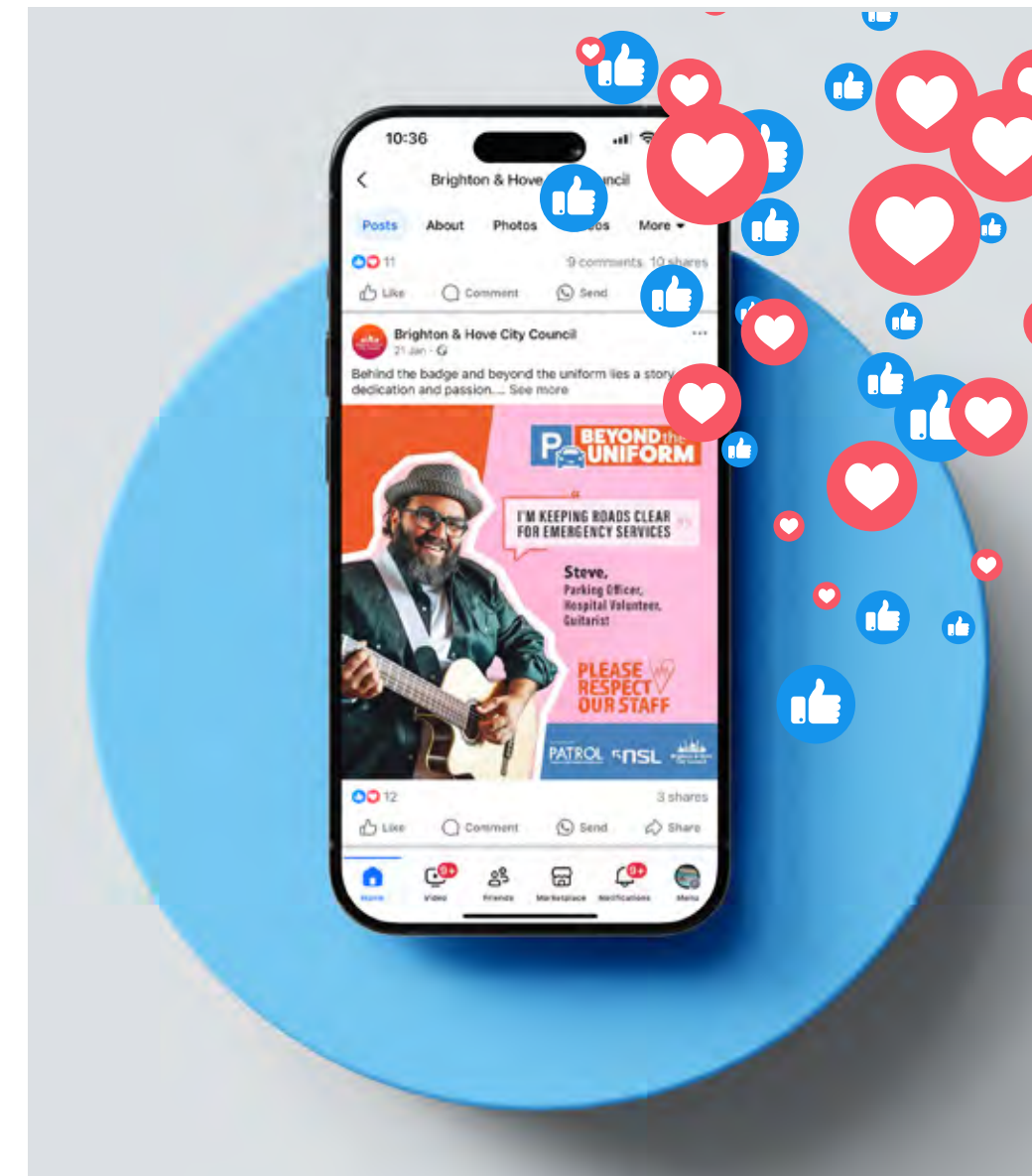
Several of the media outlets also ran follow-up features or multiple articles about the campaign which was great at sustaining momentum and coverage.





## Communications and Marketing

- Paid social media advertising impressions in Harlow had a **reach of 246,205**, with **748,573 impressions** and **941 clicks** to learn more about the campaign on NEPP's website. We also only received two negative comments.
- Bus advertising in Harlow had **577,000 impacts**.
- **19 media features** at local, regional and national level (with more to come).
- **42,000 households** received Harlow Council's printed resident magazine, the Harlow Times which featured a double-page feature.
- **3000 impressions** on the NEPP's LinkedIn.
- **7000+ members of staff and councillors** were reached through internal communications issued to Harlow Council, Essex Police and NEPP.
- **375 interactions** with the public at pop-up community events in Harlow.
- **24 NEPP staff** competition entries received.





## Events

NEPP held three pop-up community events in The Harvey Shopping Centre in Harlow, at which our staff engaged with a total of **375 individuals** where we had really meaningful and insightful conversations with members of the Harlow community. At these events, NEPP gave out materials created specifically for the campaign which included A5 postcards, keyrings and pin badges, as well as offering refreshments.

In addition to these local events, NEPP also raised awareness of the campaign nationally at a number of parking sector events, including, but not limited to:

- BPA Live North in Leeds
- BPA Live South in Brighton
- BPA Live West in Bristol
- Landor North East Parking Show in Newcastle
- Parkex 2025 in Coventry





## Violent and aggressive incidents

In terms of reported incidents of abuse towards its CEOs in Harlow, from January to March 2025, the NEPP saw a **73% decrease** compared to the number recorded for the same period the year before and a **60% decrease** compared to same period in 2023.

From January to March 2025, the NEPP also saw a decrease in the number of incidents reported NEPP-wide, however this was a much smaller decrease of 23%. The decline in the other five NEPP areas could be due to the coverage the campaign had in those areas, particularly the media coverage e.g. BBC Essex covers all six areas.





# 7 RESPONSES

“

I have just listened to the recording on the radio this morning. Wow very powerful stuff it really was fantastic the message was loud and clear.

”

“

Well done all, hopefully the momentum can be kept up to make it clear how tough the job is and how lucky the public are to have such dedicated and selfless people prepared to help!

”

“

”

Thank you from every CEO and those that have been CEOs for helping the public to view us as people and recognise that we are just doing our jobs.

“

It's good to feel like the issue of the daily abuse that CEOs experience is being addressed.

”

“

The campaign has made CEOs feel heard and encouraged people to report more incidents to hold people accountable. In all the campaign was really positive but should just be the beginning.

”

“

Credit to all those involved it is a very brave thing to go and talk openly about the abuse well done.

”

“

Huge thanks to 'L' for her tireless effort into this campaign it has gone off with a bang and is on course to really make a difference. If we can stop one CEO from being insulted/assaulted, then it has all been worth it although I am sure it will have a far wider reach than that.





# 8 PARTNERSHIPS

Through this pilot campaign, the NEPP collaborated with and made new and improved partnerships with:

- PATROL
- Brighton and Hove City Council
- Harlow Council
- Essex Police
- Media contacts

We were also approached by other parking authorities about the campaign, who gave us positive feedback and expressed an interest and desire to introduce the campaign in their local areas too.

“It has been a pleasure working with Colchester City Council and the NEPP for the Beyond the Uniform campaign. Their expertise in communications and marketing provided us with the tools to promote the campaign to a high level. The artwork they created fitted the brief perfectly. It’s eye-catching, educational, humanising and impactful. Additionally, their support with alterations and resizing the artwork enabled us to enhance the visual aspects of the campaign significantly. This achievement would not have been possible without their assistance. I hope we can collaborate with them again in the future.” - **Sarah Bussey, Parking Contracts Manager, Brighton and Hove City Council**

”



# 9 HIGHLIGHTS & CHALLENGES

## Highlights

The campaign achieved a number of significant successes, both in terms of external impact and internal organisational benefits.

One of the most notable highlights was the volume and breadth of media interest and coverage. The campaign attracted attention across a wide range of local and regional media outlets, reflecting the relevance and resonance of its messaging. This coverage not only helped to amplify the campaign's reach but also led to ongoing support and follow-up features, demonstrating sustained media engagement well beyond the initial launch period.

Internally, the campaign had a profoundly positive effect on staff morale. Many staff members expressed feeling heard and valued as a result of the campaign, particularly those who contributed their stories or saw their experiences reflected in campaign materials. This sense of recognition contributed to a more positive workplace culture and stronger internal engagement.

Encouragingly, within the pilot area, there was a noticeable reduction in the number of abusive incidents reported by staff during the campaign period. While this is a complex issue with many contributing factors,

this trend suggests that the campaign played a role in raising awareness and encouraging more respectful behaviour toward staff.

In addition to these outcomes, the campaign helped to forge new and improved relationships with a number of external partners. The collaborative nature of the work opened up new channels of communication and strengthened mutual understanding, laying the groundwork for future partnership opportunities and joint initiatives.

These highlights reflect the broad and lasting impact of the campaign, not only in achieving its immediate goals but in setting the stage for ongoing progress and collaboration.





# Challenges

Despite the huge success of the campaign, several challenges emerged during its planning and delivery phases, many of which required ongoing adaptability and problem-solving.

One of the primary challenges was a significantly reduced budget and shortened delivery timeframe compared to what was originally applied for. This placed pressure on all stages of the campaign, from idea generation and development through to implementation. These constraints limited the scale and flexibility of planned activities, requiring prioritisation of core outputs over broader ambitions.

Another key difficulty was sourcing multiple CEOs within our organisation who were willing and comfortable to share their personal stories and experiences for use as case studies. This involved utilising internal comms, providing media training for staff members as well as building trust and ensuring individuals felt fully informed and supported throughout.

Financial processes presented additional challenges. Campaign materials had to be paid for upfront from our own budget, with reimbursement claimed afterwards, which hadn't been anticipated or factored into financial planning for the year. This created a temporary strain on internal resources.

Furthermore, there was initial uncertainty around which items were eligible for reimbursement, which led to delays and additional administration.

The nature of the funding award also introduced complexities. While we originally applied for the full amount as a single organisation, the award was ultimately granted on a shared basis with Brighton and Hove City Council, with whom we had no prior relationship. Although this collaborative arrangement ultimately proved successful and productive, it did require an initial period of coordination to align goals, strategies and styles.

In addition, our in-house design team provided support to Brighton and Hove City Council in developing their campaign assets, as they lacked the internal resource to do so. While this fostered a spirit of cooperation and strengthened the partnership, it also placed extra demand on our team and required careful balancing of workloads.

These challenges, while significant, were met with a proactive and flexible approach by all involved. Lessons learned throughout this process have provided valuable insights for future campaign planning and partnership working.





# 10 NEXT STEPS

The Beyond the Uniform pilot campaign has, without doubt, been a huge success for NEPP in so many ways. Whilst the pilot and our funded activity may now have ended, NEPP is keen to build on the positive work, momentum and progress that has come from this pilot.

## Our staff

Staff engagement with the campaign was very high, and both the materials and activities were well received, with excellent feedback. Many of our staff have been really interested and eager to get involved in the campaign, whether that be helping out at the community events, delivering materials, sharing their stories with the media etc.

The organisation's work on the campaign, along with efforts to strengthen our relationship with the Police when incidents are reported, and the sharing of successful prosecutions for abusive behaviour - both internally and externally - has helped boost staff morale and foster a more positive outlook on the role and the future of tackling this issue.

We have been clear with staff, that whilst the paid pilot activities may now have ended, the campaign has not and we will continue to develop this further with them and are keen to keep the staff morale high, which will hopefully also help with staff wellbeing and retention.

## Community Events

The NEPP is keen to continue and expand on the community events it piloted in Harlow and deliver these in the five other districts where the NEPP operates. These events proved to be a great way to raise awareness of the issue and humanise CEOs. They were also a great opportunity to engage with the local communities we serve and have meaningful and helpful discussions with the public which have provided us with valuable customer insight.

As well as pop-up events in high footfall locations, we'd like to attend other local community events in these areas too, including Essex Police and Essex Fire and Rescue Service's local Open Days as these tie in well with our messages, locations and are well attended by the local community. Being present at emergency service open days will also highlight the link and vital role our staff play in allowing emergency vehicles and staff to get to emergencies as soon as possible.

## Partnerships

Through this campaign, we have broadened and deepened our relationships with a number of partners and are keen to continue building those relationships and work with them to raise awareness of the issue and tackle violence and aggression towards our staff. This includes our partners and contacts in Harlow (especially Harlow Council), Essex Police, PATROL, the wider parking sector and of course the media.

## Media

We are extremely grateful to the media for their support in helping us highlight this campaign and for the valuable coverage and visibility they have provided. Following the initial launch in January, several media outlets have already run follow-up features and are keen to work closely with us on this in the future, which is something we're very grateful for and happy and willing to do.

## **Funding**

If and when more funding becomes available for the campaign, we would like to run some of the paid marketing activities in other NEPP areas, particularly social media and bus advertising and explore other marketing opportunities. We will also be continuing to closely monitor the number and types of incidents in Harlow and, if needed and funds allow, rerun some of the paid activity from the pilot.

We remain very interested in extending the campaign to learner drivers. Unfortunately, due to changes in funding and timelines from our original application, we were unable to include them as a target audience in this pilot. However, we conducted extensive early-stage research, including focus groups, and still see strong potential to influence driving behaviour from the point of learning.

## **Materials**

The materials NEPP designed that were used in both Harlow and Brighton have delivered everything that we hoped for

the campaign – they have delivered the objectives, been eye catching and have been flexible.

We are currently preparing a catalogue of all seven designs/individuals that featured in the campaign, including how they were adapted and utilised on various materials and media. The relevant designs have already been white-labelled and sent to PATROL for any planned national roll-out later this year.

## **Events**

We will continue to showcase and discuss the pilot campaign at upcoming events, including ParkEx in May and the PATROL Awards in July. At the PATROL Awards, we plan to recreate our community event setup - including the gazebo and campaign materials - so other members can experience it firsthand. Staff from across the organisation, including CEOs and our Communications Team, will be present and happy to discuss the campaign, including delivery, costs, impact and their experiences.

In addition to these events, we will

continue to share the campaign locally, regionally, and nationally. Where supplies allow, we will also distribute campaign materials such as pin badges and keyrings to help raise awareness.

## **National usage**

We hope that other PATROL members will find our pilot campaign and its outcomes of interest and use. The campaign has been designed to be adaptable, allowing others to tailor it to their local needs and resources. While time, budget, and staff expertise may be key considerations for those looking to adopt the campaign, as mentioned NEPP has developed and shared white-labelled artwork and assets with PATROL to help alleviate these concerns. From the outset, we were mindful of the need for accessible, adaptable materials, so we created free and low-cost options - including media resources, email signature graphics, and editable poster templates.



# 11

## CONCLUSION

**The purpose of the 'Beyond the Uniform' campaign was to tackle violence and aggression towards our frontline staff.**

The campaign has delivered this in Harlow through effective messaging, artwork and targeted strategies. Our results suggest that in Harlow, the campaign successfully raised awareness of the issue, significantly reduced the number of incidents and signalled a clear stance of zero tolerance towards abuse.

Engagement across key channels - particularly through personal case studies and experiences and stories, demonstrated that empathetic storytelling and real staff voices resonate strongly with audiences.

Importantly, staff said they felt more supported and confident because of the visible campaign and messages from the organisation, showing a positive effect on workplace culture. However, continued reinforcement and awareness and broader audience targeting - especially in other NEPP partner areas - will be essential for sustaining behaviour change.

**The pilot campaign has been a huge success for NEPP as well as its staff, partners and the wider parking sector and we are excited for the next steps, both for us and PATROL.**





# 12 FEEDBACK

”

The campaign has had a noticeable impact on staff, as they now realise we are truly taking things to another level. Personally, I've had members of the public approach me to say they've seen the campaign, and that it genuinely makes them reflect - on our roles and on life more broadly. It's encouraging to see it resonate so widely. We've also observed a reduction in incidents, which I believe is, in part, thanks to this initiative. It would be fantastic to see the campaign rolled out across the entire NEPP, as it's clearly having a very positive effect.

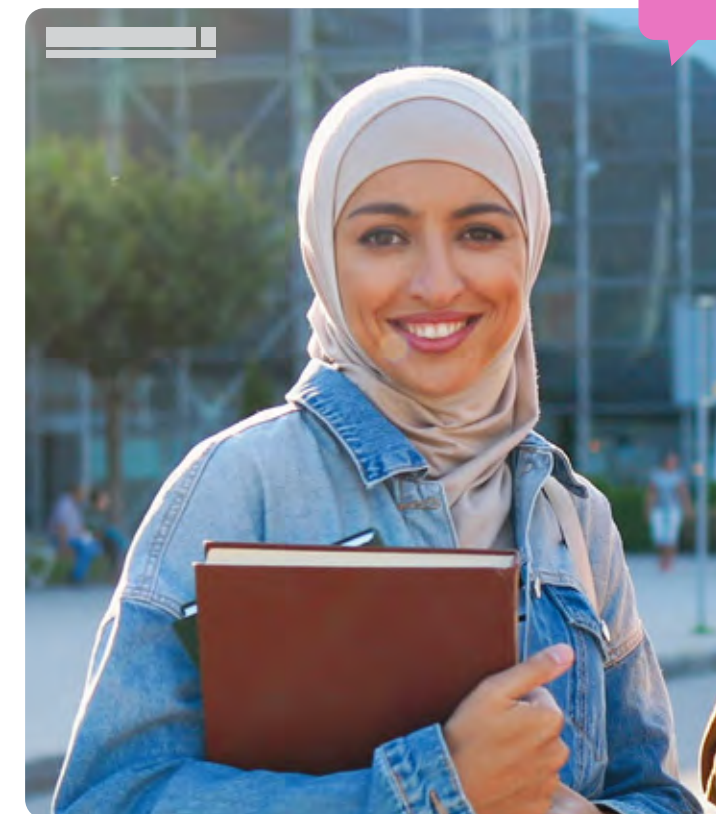
**CEO at the NEPP**

”

I'm pleased to say that the reaction from the staff team was very favourable; very pleased that someone was petitioning on their behalf, to raise the profile of front line workers amongst the public - and the results of the campaign speak for themselves.

**Richard Walker,**  
Head of Parking at the NEPP

Meet Safiya, a dedicated parking officer, a loving mum, and a passionate baker.



Meet Kate, a devoted daughter and a hardworking part-time student.



Meet Steve, who plays the guitar and volunteers at the hospital.

Meet Tony, a husband with a creative side, who enjoys expressing himself through painting.



**PLEASE  
RESPECT  
OUR STAFF**

**PATROL Adjudication Joint Committee**

---

<b>Date of Meeting:</b>	15 <sup>th</sup> July 2025
<b>Report Title:</b>	PATROL / TPT Summer User Groups
<b>Report of:</b>	Iain Worrall, Stakeholder Engagement & Systems Manager

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**1.0 Purpose of Report**

- 1.1** To provide a summary of the PATROL / TPT User Groups held in June 2025 including key topics discussed, attendance analysis, financial performance and recommendations for future delivery.

**2.0 Recommendations**

- 2.1** To note the report.
- 2.2** To support the following proposals put forward by officers in respect of how future user groups should be organised:-
- (i) Continue delivering in person user groups within the current budget framework where service need and useful content permits.
  - (ii) Introduce more measures to reduce no-shows and last-minute cancellations.
  - (iii) Offer hybrid or virtual options for less accessible regions (e.g. Wales), to avoid event cancellations.
  - (iv) Prioritise cities with high attendance rates for future events, while testing remote formats in low-turnout areas.
  - (v) Implement virtual/digital user engagement sessions (full programme to be considered) between live events to further broaden and develop user engagement.
  - (vi) The Chief Adjudicator and Director will determine individual applications for 1-2-1 authority engagement sessions and will prioritise user needs vs expenditure before committing to individual authority visits.



### **3.0 Reasons for Recommendations**

- 3.1** To keep the Joint Committee updated.
- 3.2** Attendees rated sessions highly in terms of relevance and delivery and gave strong positive feedback.
- 3.3** No-show rates (16-28%) suggest that although an attendee reminder process was in place, it was ineffective in that it did not secure a loss of expenditure from late cancellations or no shows. Improved attendee commitment strategies could be implemented to reduce the number of last-minute cancellations.
- 3.4** The cancellation of the Llandrindod Wells event (owing to only 12 registrants) highlighted the need to plan events with transport accessibility and attendee travel duration at the forefront. Whilst assurances were given that this location has been successful in terms of engagement in the past, in a post-covid era, we should model smaller events in easier to reach locations that are not considered burdensome for attendees to access and encourage the shift towards more digital engagement for authorities in more rural locations.
- 3.5** More frequent, cost effective and less time-consuming digital engagement sessions, which focus on individual topics, should be modelled and tested to reduce the burden on authority and PATROL budgets in future years.

### **4.0 Background**

- 4.1** In June 2025, PATROL and TPT hosted regional user groups in Nottingham, Birmingham, Exeter, Newcastle and Manchester, with the final session scheduled in London on 16 July. An event in Llandrindod Wells was cancelled due to low registration numbers.
- 4.2** The user groups brought together authority officers for a day of learning, discussion and collaboration, featuring updates from PATROL and TPT, interactive case studies and discussions around developments such as the Key Cases website and the Driving Improvement Awards.

### **5.0 Key Topics Covered**

#### **5.1 PATROL and Joint Committee Update**

The Director delivered a comprehensive update, highlighting PATROL's strategic initiatives, engagement with enforcement authorities and the Joint Committee as well as an overview of political shift in recent years in regard to the committee's membership.

#### **5.2 Appeals and Judicial Process**

The Chief Adjudicator provided an overview of the tribunal process, clarifying the stages from appeal submission to adjudication and outlining the respective responsibilities of each party in the judicial process.

### **5.3 Case Study Exercise**

Attendees participated in collaborative adjudication exercises using example tribunal cases. This interactive session illustrated how different but lawful outcomes can emerge based on evidence interpretation, reinforcing the role of judicial discretion.

### **5.4 Appeal Submissions and Best Practice**

An update on submission quality trends and recurring issues was shared, with practical advice on ensuring clear, relevant and complete documentation in support of fair and efficient adjudication.

### **5.5 Technology and Future Development**

The tribunal's recent system enhancements were demonstrated, and attendees were invited to offer feedback on future features and improved system interoperability with authorities.

## **6.0 Overview**

**6.1** The user group sessions continue to provide a valuable platform for professional development, peer learning and the exchange of ideas across authorities.

**6.2** The interactive format, including real case exercises, helps build officer confidence in making decisions and understanding the tribunal process.

**6.3** Positive levels of engagement in most locations suggest that there remains a need for occasional in-person engagement; however, non-attendance and regional disparities (such as the cancelled Wales event) highlight a need for both flexibility in the format and a move to more regular digital engagement in future.

**6.4** Ongoing engagement helps maintain consistency in enforcement standards, contributing to the credibility and transparency of the appeals process.

## **7.0 Implications**

### **7.1 Finance**

**7.1.1** Expenditure was under budget. Avoidable losses incurred by no shows, late cancellations and the cancellation of the Wales event.

### **8.1 Risk Management**

**8.1.1** Non-attendance impacts both the effectiveness and efficiency of events and well as contributing to cancellation costs.

**8.1.2** The Llandrindod Wells cancellation highlights the need for flexible delivery formats in lower demand areas.

**8.1.3** Future events would benefit from enhanced communication strategies and delivery by alternative formats to mitigate these risks.

## **9.1 Legal**

- 9.1.1** Sessions provided relevant updates on legislation and case law. The case studies supported a practical understanding of legal principles and tribunal processes, strengthening the confidence and capability of local authority officers.

## **10.0 Conclusion**

- 10.1** The sessions were positively received and attended by roughly 250 officers (to date), demonstrating the continued value of occasional in-person engagement. Attendees' contributions and enthusiasm reinforced the value of collaborative learning and continuous improvement across the sector and provided both the Chief Adjudicator and Director with positive insights and feedback directly from authority users.
- 10.2** The Stakeholder Engagement team will reflect on the learning from these recent events and prepare a strategy for future engagement over the coming months – generating plans for greater levels of cost-efficient, consistent and reliable digital engagement sessions to capitalise on the benefits of regular user engagement highlighted throughout this report.



# PATROL

## Public Affairs Update: To 11 June 2025

### 1. Current traffic management issues / areas of engagement

#### a. Pavement Parking

- **England (outside London):** PATROL continues to await a formal response from the Department for Transport (DfT) – following its October 2020 consultation – on when policy changes will be announced.

In late May, the Future of Roads Minister, Lilian Greenwood, indicated the Department would: *‘...publish a formal response to the 2020 consultation; one that will summarise the views received and announce our next steps. That is coming later this year.’*

The Minister also publicly stated this aim during the recent Traffex / Parkex industry event earlier in May and, during a Commons Chamber event on 15 May, indicated that she was: *‘...working speedily with my officials to do so, and I look forward to being able to announce the outcome of the consultation and our next steps shortly.’*

These updates follow PATROL writing to the Minister and former Secretary of State, as well as conducting subsequent engagement with Department officials, over the last year.

**PATROL will update members on any further response it receives from the DfT as soon as possible and appropriate.**

- **RESOURCE FOR AUTHORITIES:**  
While PATROL awaits the Government’s response, authorities are encouraged to write to the Secretary of State on the issue of pavement parking in their own area. While the inclusion of data from local areas is key to the impact of such correspondence, PATROL has prepared a briefing document with suggested general wording, data and more to help authorities frame their own letters.
  - **Access PATROL’s pavement parking briefing document on the Member Portal at:** <https://www.patrol-uk.info/ctspoyc>.
- **Wales:** The Welsh Government’s plans to give councils powers to enforce against pavement parking have been on hold since 2023.
- **Scotland:** The *Transport (Scotland) Act 2019* bans pavement parking, double parking and parking at dropped kerbs, with certain exemptions designated by local authorities; for example, to ensure safe access for emergency vehicles. Authorities currently enforcing pavement parking include the major cities, Aberdeen, Dundee, Edinburgh, Glasgow and Stirling (commencing 15 July), as well as a number of other councils across the country.

## **b. Level of civil parking penalty charges and financial impact of enforcement in England**

- PATROL has recently conducted research with its authorities into how the current civil parking penalty charge levels are impacting its authorities. The main findings of the research were as follows:
  1. Over a third of authorities' (34%) parking services no longer pay for themselves (operating costs have increased 29% on average).
  2. More than half of authorities (54%) believe the current levels of parking penalty charges are ineffective as a deterrent.
  3. Over two thirds of authorities (70%) reported individual motorists regularly receiving and paying PCNs in their area.
- A copy of the research report is available at:  
[https://www.patrol-uk.info/docs/PATROL-PCN-Research-Docs/PATROL\\_BPA\\_LGA\\_Research\\_report\\_Civil\\_parking\\_penalty\\_levels\\_RELEASE\\_100424.pdf](https://www.patrol-uk.info/docs/PATROL-PCN-Research-Docs/PATROL_BPA_LGA_Research_report_Civil_parking_penalty_levels_RELEASE_100424.pdf).
- In response, PATROL (with the support of the British Parking Association [BPA]) is currently engaged with the DfT and Ministry of Housing, Communities & Local Government (MHCLG) on the following recommendations:
  1. The levels of civil penalty charges in England and Wales enforced under the *Traffic Management Act 2004* (TMA) should be increased to £100 (lower-level contraventions) and £130 (higher level), as appropriate.
  2. The PATROL Joint Committee should be given the ability to regularly consult on and review civil penalties (for parking and other traffic schemes) as part of PATROL's statutory function, bringing powers in line with the London model and depoliticising the issue moving forward.
  3. Approved device enforcement powers should be granted to authorities for the civil enforcement of off-street car parks.
  4. Statutory enforcement documents (post-PCN) should be issued digitally, rather than by first-class post, where motorists have engaged with the digital route.
- **The recommendations relating to DfT authority are currently with the Future of Roads Minister, Lilian Greenwood, following extensive engagement with the DfT policy team amid numerous changes to the Transport ministerial team over the last year.**
  - The Minister has indicated a national review of penalty charge levels would be required before any action is taken for English authorities. Responding to recent media reports, the Department has also indicated there are no plans to raise penalty levels in England. This is despite levels for London being uplifted only in February.
  - PATROL (together with the BPA) has expressed its dissatisfaction with this 'two-tier' position and has requested a face-to-face meeting with the Minister to understand her reasoning and express again its recommendations.
  - The Minister has indicated enthusiasm on changing the requirement for first-class posting of enforcement documents, with an update expected soon.
- **The recommendation to allow authorities approved device powers for civil enforcement of off-street car parks is in process with MHCLG, following an earlier meeting with the parking policy team inviting a paper setting out possible solutions.**

### c. Moving Traffic Powers in England (outside London)

- **Applications for a fourth tranche of authorities to receive moving traffic enforcement powers close on 7 July. Please advise PATROL ASAP if your authority has plans to adopt the powers.**
- The Designation Order for **Tranche 3** came into force on 7 December 2024, with the following new **22 authorities** included:
  - Bolton Council, Bury Council, Devon County Council, Dudley Metropolitan Council, Hull City Council, Leicestershire County Council, North Somerset Council, North Yorkshire Council, Nottinghamshire County Council, Plymouth City Council, Portsmouth City Council, Sandwell Metropolitan Borough Council, Sefton Council, Solihull Metropolitan Borough Council, Southend-on-Sea City Council, Stockport Metropolitan Borough Council, Suffolk County Council, Sunderland City Council, West Sussex County Council, Wiltshire Council, City of Wolverhampton Council and City of York Council.
- Local authorities already approved to enforce moving traffic restrictions are as follows:
  - **Tranche 2: July 2023 order – 40 authorities:** Birmingham City Council, Bournemouth, Christchurch and Poole Council, Bradford Council, Bristol City Council, Cambridgeshire County Council, Central Bedfordshire Council, Cheshire West and Chester Borough Council, Coventry City Council, Gloucestershire County Council, Herefordshire County Council, Hertfordshire County Council, Lancashire County Council, Leeds City Council, Leicester City Council, Liverpool City Council, Manchester City Council, Medway Council, Newcastle City Council, North Northamptonshire Council, Nottingham City Council, Oldham Council, Peterborough City Council, Rochdale Council, Rotherham Metropolitan Borough Council, Salford City Council, Sheffield City Council, Shropshire Council, South Gloucestershire Council, Southampton City Council, Stoke-on-Trent City Council, Thurrock Borough Council, Trafford Council, Walsall Council, West Berkshire District Council, West Northamptonshire Council, West Sussex County Council, Wigan Council, Royal Borough of Windsor and Maidenhead Council, Wirral Council and Wokingham Borough Council.
  - **Tranche 1: July 2022 order – 12 authorities:** Bath & North East Somerset Council, Bedford Borough Council, Buckinghamshire Council, Derby City Council, Durham County Council, Hampshire County Council, Kent County Council, Luton Borough Council, Norfolk County Council, Oxfordshire County Council, Reading Borough Council and Surrey County Council.
- The Traffic Penalty Tribunal decides appeals relating to the enforcement of moving traffic contraventions. As of the publication of this report, 966 appeals have been registered at the Tribunal against PCNs issued from 40 English authorities.

#### d. Level of private parking penalty charges and debt recovery fees in England

- The then Department for Levelling Up, Housing and Communities (DLUHC) – under the previous government – consulted in 2023 on the level of penalty charges that private parking operators can charge, as well as the associated debt recovery fees.
    - The consultation (<https://www.gov.uk/government/calls-for-evidence/private-parking-code-of-practice-call-for-evidence/private-parking-charges-and-debt-recovery-fees-call-for-evidence>) was part of the Government's industry reform efforts through the *Parking (Code of Practice) Act 2019*.
    - PATROL's response is available to view or download at: [https://www.patrol-uk.info/wp-content/uploads/2024/05/PATROL-response-to-Private-Parking-CfE\\_FINAL\\_061023.pdf](https://www.patrol-uk.info/wp-content/uploads/2024/05/PATROL-response-to-Private-Parking-CfE_FINAL_061023.pdf).
    - The Government's proposed new Code of Practice was published in February 2022, but then withdrawn pending further consultation.
  - Separately to DLUHC (now MHCLG) and its work on the Code of Practice, the BPA and International Parking Community released their own version of a Code of Practice in June 2024.
    - The organisations state their Code (<https://www.britishparking.co.uk/write/Documents/AOS/NEW%20Redesigned%20Documents/sectorsingleCodeofPractice.pdf>) is based on the Government's, but with a series of amendments, and that their members should be required to meet the new standards by December 2026.
  - In May, a Westminster Hall debate (<https://hansard.parliament.uk/Commons/2025-05-06/debates/DE2A42ED-5A2B-49E3-835E-CFD8ADB3806B/ParkingRegulation>) covered regulation of the private parking sector, with numerous MPs expressing a series of concerns, including:
    - continuing unfair practices, such as unclear signage, broken machines, poor-performing mobile apps and inaccurate ANPR readings, as well as aggressive correspondence from operators
    - criticism of the existing industry appeals bodies, including their independence and conflicts of interest. One MP, Martin Rhodes (Labour, Glasgow North) stated:  
*'The International Parking Community and the Independent Appeals Service are both trading names of one company, United Trade and Industry Ltd. This overlap raises legitimate concerns about perceived conflicts of interest, as the same corporate entity that profits from private parking companies through membership fees is responsible for overseeing the code of practice and adjudicating disputes under it. This lack of separation, clearly, could undermine trust in the fairness of the process.'*
- MPs from all parties urged a statutory (not voluntary) Code of Practice moving forward, with independent regulation and a single appeals body.
- **The Minister, Alex Norris MP, Parliamentary Under-Secretary of State at MHCLG, acknowledged that action was needed following the withdrawal of the Government's code in 2022. He has committed to the Department publishing a new draft code 'shortly'.**



## **e. Restricting the generation of surplus funds from traffic contraventions**

- The DfT (under the previous government) gathered evidence on councils' abilities to generate and / or retain a surplus from traffic enforcement, the practices that may lead to such surpluses being generated and what the impact may be if the revenue was surrendered to HM Treasury, rather than being used to fund local transport projects.
  - View the consultation at: <https://www.gov.uk/government/calls-for-evidence/restricting-the-generation-of-surplus-funds-from-traffic-contraventions/restricting-the-generation-of-surplus-funds-from-traffic-contraventions>.
- The consultation followed the publication of the then government's *Plan for drivers* (<https://www.gov.uk/government/speeches/plan-for-drivers-ensuring-traffic-measures-have-local-support>) in October 2023, which targeted the improvement of drivers' experience and services provided for motorists.
- In light of PATROL's research referenced at Item '2b', which conversely found councils are facing financial shortfalls and that any surpluses were generally small or non-existent, PATROL responded to the call for evidence on surpluses, making reference to its findings and subsequent recommendations.
  - PATROL's response is available to view or download at: [https://www.patrol-uk.info/wp-content/uploads/2024/05/DfT-Call-for-Evidence\\_Restricting-surpluses\\_PATROL-Response\\_090524.pdf](https://www.patrol-uk.info/wp-content/uploads/2024/05/DfT-Call-for-Evidence_Restricting-surpluses_PATROL-Response_090524.pdf).

**PATROL awaits a formal response to the consultation on surpluses from the DfT. The Future of Roads Minister, Lilian Greenwood, indicated the Department was still considering the consultation in response to a written question on 9 June.**

## f. Other items of interest since last report

- **6 June: CONSULTATION OUTCOME**

- **Remote attendance and proxy voting in local authorities**

MHCLG consulted in December 2024 on enabling remote attendance at local authority meetings. The Department has now responded reaffirming the importance of in-person meetings for local democracy, while recognising the value of hybrid and remote attendance and voting as more modern, accessible practices.

- Legislation is planned to enable local authorities in England to adopt remote attendance and proxy voting, when parliamentary time allows. Authorities will be empowered to create locally appropriate remote meeting policies.
    - Principal councils (unitary, upper and second-tier) will be required to offer proxy voting at full council meetings for members absent due to new parenthood or serious illness. For other meetings, it will be optional. Other councils can choose to offer proxy voting but won't be required to.

Read the full consultation results and outcome at:

<https://www.gov.uk/government/consultations/enabling-remote-attendance-and-proxy-voting-at-local-authority-meetings/outcome/remote-attendance-and-proxy-voting-in-local-authorities-consultation-results-and-government-response>.

- PATROL submitted a response in favour of allowing fully remote meeting attendance and canvassed opinion from members, which showed 85% of respondents would prefer to attend meetings remotely only. Other findings of the survey were equally compelling, including that 77% have missed or decided not to attend a meeting due to it being held in person, and 89% would save from four hours to a day by being able to attend remotely.

**PATROL awaits the Government's legislative plans.**

- **3 June: UPDATED GUIDANCE**

- **Blue Badge scheme local authority guidance (England)**

This guidance was updated to cover onboarding and use of the Department for Work and Pensions (DWP) 'Searchlight' system to validate Blue Badge applicants in receipt of a qualifying PIP or HRMCLDA award. Find out more at:

<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england/blue-badge>.

- The latest *Disability, accessibility and blue badge statistics* for England (2023-24) were published by the DfT in January:  
<https://www.gov.uk/government/statistics/disability-accessibility-and-blue-badge-scheme-statistics-2023-to-2024/disability-accessibility-and-blue-badge-statistics-england-2023-to-2024>.

- **21 May: PRESS RELEASE – Government transfers responsibility for National Parking Platform to the BPA**

<https://www.gov.uk/government/news/government-teams-with-parking-giants-to-ensure-drivers-can-use-preferred-apps-in-all-car-parks>

The new agreement will see the BPA working with councils to run the platform on a not-for-profit basis. It will operate under clear terms to ensure transparency, sustainability and public value. The government will maintain oversight of the platform by monitoring the sector's compliance with these terms. So far, the platform has been rolled out in 10 local authorities.

- **22 April: PRIVATE MEMBERS BILL**

- **Littering from Vehicles (Offences) Bill (under Ten Minute Rule)**

Claire Hughes MP (Labour, Bangor Aberconwy) has proposed a bill to ‘...*increase penalties for civil offences relating to littering from vehicles to make provision about the use of technology in detecting and identifying persons who have committed such offences; and for connected purposes.*’

The bill had its First Reading in the Commons Chamber on 22 April:

([https://hansard.parliament.uk/Commons/2025-04-22/debates/37F6812D-5BF1-43B6-BB8F-8B6476F897E0/LitteringFromVehicles\(Offences\)](https://hansard.parliament.uk/Commons/2025-04-22/debates/37F6812D-5BF1-43B6-BB8F-8B6476F897E0/LitteringFromVehicles(Offences))), with the Second Reading scheduled for 11 July.

- **12 April: SPEECH FROM SECRETARY OF STATE FOR TRANSPORT**

- **‘Vision for transport’**

<https://www.gov.uk/government/speeches/secretary-of-state-for-transport-vision-for-transport>

The Secretary of State for Transport has set out her vision for a transport system that ‘works for everyone’.

- **20 March: DVLA DIGITAL SERVICE ENHANCEMENT**

- **New QR code service launched to make sharing driving license information easier**

Motorists who have signed up for a driver and vehicles account (<https://www.gov.uk/driver-vehicles-account>) can now use a QR code to share their driving licence information quicker and easier than ever before.

## 2. Driving Improvement Awards enters its second year



- **PATROL's Driving Improvement Awards offers member authorities the chance to submit a bid for funding to develop a public awareness campaign or activity to effect change in their area, with bids encouraged around a specific theme each year, based on current or pressing events, issues and trends in the traffic enforcement landscape.**
- A key aim of awarding funding is that the winning campaign can act as a model of action for other authorities, with materials produced subsequently being made available for free use by other councils. In this way, councils can seek to replicate the success in their own communities, reducing the burden on their individual finances and drawing widespread attention to important issues.
- In the Awards' first year (2024-25), PATROL's Advisory Board chose the theme of abuse experienced by civil enforcement officers and other enforcement staff. This focus was chosen in response to the consistent and high-profile negative public sentiment towards parking and traffic enforcement across authorities; a problem that has been systemic for many years.
- The winning bids came from Brighton & Hove City Council and North Essex Parking Partnership (NEPP), who worked together and with PATROL to develop and deliver a campaign in their local areas – **'Beyond the Uniform'** – from January 2025.
  - The campaign received significant engagement, with over a **quarter of a million impressions** across social media and digital channels, as well as national media interest.
  - In North Essex, a **73% decrease in incidents of abuse was recorded in Harlow during the campaign activation period year-on-year with the same period, with a 60% decrease for the year in full.**
  - PATROL will be rolling out the creative assets produced for the campaign, white-labelled, for all its authorities to take forward in their own areas and coordinating a wider awareness effort about staff abuse, the campaign and its outcomes in the coming months.
- **The 2025-26 Driving Improvement Awards has invited bids from authorities on the theme of Blue Badge abuse and misuse.** This is a growing and ever more widely reported issue impacting all authorities, with recent data indicating continuing rises in both badge thefts and fraudulent usage.
- **A shortlist of four authority bids has been decided, with the winning authority set to be unveiled at PATROL's Annual Reception on Tuesday 15 July.** The event will also see Brighton & Hove and NEPP presenting their activities and results from last year's campaign.