

Equality Impact Assessment

Appendix 3

Part 1: Basic details

Project title	Household Recycling Centre Service Review
Is this a new or existing document/service?	Existing service
Responsible officer	Gurbaksh Badhan
Job title	Head of Waste Management
Contact no.	
Team	Waste Management
Service	Environment
Business Unit	Transport Economy Environment (TEE)
Date started	Initial assessment date – June 2018
Date completed	10/12/18 and to be reviewed post Cabinet decision (07/01/19)

Part 2: Purpose and Objectives

2.1	What is the purpose of the project or change?	<p>The purpose of this project is to review the current Service and propose changes to help meet £1.25million savings target whilst minimising a reduction in the satisfaction rates experienced by residents.</p> <p>The review into the household recycling centres incorporates options modelling, benchmarking and a consultation report.</p>
2.2	What are the key objectives of the project or change?	<p>Proposed changes, as a result of the work completed to date on the Household Recycling Centre (HRC) Service Review, are:</p> <ul style="list-style-type: none"> • Charging for some types of waste at all sites (Buckinghamshire and non-Buckinghamshire residents) • Reduction from 7 to 5 days opening for initially 3 and then potentially 2 HRCs (with the closure of Burnham) • 2 HRC site closures (with Burnham closure deferred for 5 months) • Cross-border usage considered
2.3	Which other functions, services or policies may be impacted?	<ul style="list-style-type: none"> • Waste Access and Acceptance Policy (WAAP) – The current policy sets out the guidelines for the Council and users of the service. It includes details of the permit system, restricted vehicles, and acceptable/non-acceptable waste types. WAAP has been updated as part of this project. • The Customer Contact Centre and other contact channels into the Council will be impacted, as any

Equality Impact Assessment

		<p>changes to the HRC service could result in an increase of contact made with the Council.</p> <ul style="list-style-type: none"> • The fly tipping enforcement team could be impacted if fly tipping incidents were to increase.
2.4	Who are the main stakeholders impacted by this project or change?	<ul style="list-style-type: none"> • Buckinghamshire residents • FCC Environment (current service provider) • Buckinghamshire District Councils as Waste Collection Authorities (WCAs)
2.5	Which other stakeholders may be affected by this project or change?	<ul style="list-style-type: none"> • Non-Buckinghamshire residents

Part 3: Data and Research

3.1	What data and research has been used to inform this assessment?	<ul style="list-style-type: none"> • The Council undertakes annual HRC satisfaction surveys, which compiles data regarding 2,000 users each year. Key information includes the demographics of residents who use the HRCs, as well as their patterns of usage. • Traffic counter data helps identify the pattern of usage of HRCs, including the busiest hours and days. • Options appraisal – technical summary and modelling methods. Spatial analysis of households and their nearest HRCs was also completed, using road network drive times to estimate journey time and postcodes to identify distance to nearest site. • HRC benchmarking data was compiled by APSE (Association for Public Service Excellence). Technical options modelling work was undertaken by Resource Futures and the project team, including consideration of HRC site capacity and infrastructure limitations. • Pre-engagement work prior to a full public consultation was completed by Ipsos MORI to understand residents' thoughts and ideas about possible future options. The work comprised of four discussion groups led by Ipsos MORI, an independent research company. Three groups were with residents who have used an HRC in the past 6 months and one group was with residents who have not used an HRC in the past 6 months. All groups contained a combination of residents from different district areas, with a mix of demographics including age, gender, ethnicity, disability and social grade. • A formal public consultation commenced on 28th August, and finished on 22nd October 2018, which sought resident's views on key options. It received over 6,000 responses and clearly recorded resident's opinions on likely impacts on any possible changes. • Consultation – high level of engagement (see the Consultation Report – Appendix 1 of Cabinet Report). Summary of findings:
-----	------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Equality Impact Assessment

1. Site Closures and user/demographic analysis

The most popular frequency of visits was monthly (37.8%); with 54.4% of respondents said they visited the sites monthly or less.

The map below shows the geographical spread of responses to the consultation. There were a significant amount of responses in the areas surrounding Bledlow and Burnham, highlighting the strength of feeling in those areas, shown in Figure 1 below

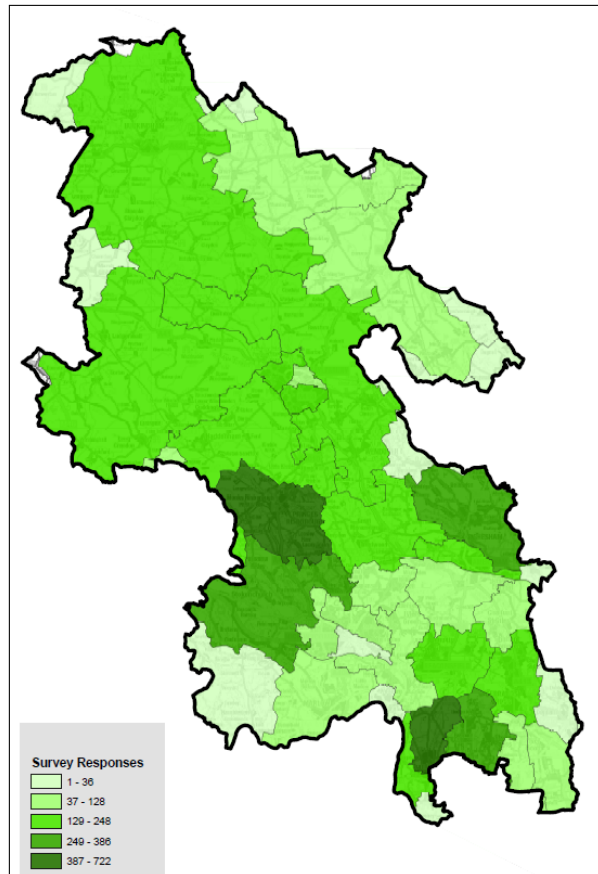


Figure 1 Geographical spread of consultation responses

2. **Week day site closures (up to three HRCs)** – No obvious weekday preference emerged, Tuesday, Wednesday and Thursday all registering between 5-6% of responses. The significant majority said that they did not mind which day (83%). Those selecting Tuesday or Thursday have chosen an option that would mean consecutive days for closure (Tuesday and Wednesday or Wednesday and Thursday). 10.4% selected either Tuesday or Thursday, compared to 6.1% of those selecting Wednesday. When analysing the comments of those who had selected a day, it was typically because it was the most convenient day for that

Equality Impact Assessment

		<p>individual (54.3%). There is some evidence that closing on consecutive days may be more supported.</p> <ul style="list-style-type: none"> • Charging non-Buckinghamshire residents for using HRCs - mixed views, some support that the Council should charge, whilst others feel HRCs are a universal service irrespective of administrative boundaries.
3.2	Have any complaints on the grounds of discrimination been made in relation to this project?	No. The public consultation received over 6,000 responses, which have been collated and will be considered by decision makers.
3.3	Please provide evidence of these.	n/a
3.4	What <u>positive</u> impacts have been established through research findings, consultation and data analysis?	<ul style="list-style-type: none"> • Benchmarking data shows the current HRC service is cost effective. • The service review recommendations plan to deliver savings in a cost effective way that will benefit Buckinghamshire tax payers.
3.5	What <u>negative</u> impacts have been established through research findings, consultation and data analysis?	<ul style="list-style-type: none"> • Fly tipping perception - remains a key concern for residents. There is a strong belief that any changes to the HRC service will lead to an increase in fly tipping. Residents made clear that any increase in fly tipping is unacceptable and would be detrimental to both individuals and the wider environment. • Site Closures - If closures go ahead, residents will have to drive further to use their nearest HRC. The Council estimates 10.8% of Buckinghamshire households are nearest to Bledlow and Burnham. This data is provided by measuring the distances from each postcode in Bucks to the nearest HRC. The data is not actual visits, but homes potentially impacted if a site were to close. A map detailing the drive times is given in the Cabinet Report. <p>Number of visits to each site per annum by Buckinghamshire residents is estimated at c.66,000 at Bledlow and c.94,000 at Burnham (the sites at which closures may occur).</p> <p>Bledlow and Burnham travel times considered</p> <p>The actual increase in travel times is individual to each visitor and visit, so cannot be realistically modelled. However, the travel times from Bledlow and Burnham HRCs to their nearest alternative have been estimated. Travel time* from Bledlow HRC to the nearest</p>

Equality Impact Assessment

		<p>alternative site (High Heavens), if Bledlow was to close is 16-20 mins. Residents in Princes Risborough could travel to Aston Clinton which is an estimated travel time of 10-14 mins.</p> <p>Travel time* from Burnham HRC to alternative sites, if Burnham was to close, Beaconsfield is 10-14 mins and Langley is 16-22 mins.</p> <p>* Typical times – Average of Google estimated times, taken each day of the week at 10am and 2pm.</p> <ul style="list-style-type: none"> • Week day site closures up to three HRCs - Residents who use Rabans Lane (Aylesbury), Burnham and Chesham HRCs will not be able to visit during two weekdays if the proposed options go ahead. They would need to visit the nearest alternative, or visit on another day. • Charging for some types of waste – for all users of the HRC network. There would be an additional cost to residents disposing of certain types of waste, if the proposals go ahead. Waste types, such as plasterboard, rubble, soil, asbestos and car tyres would incur a cost to dispose of. The annual surveys and public consultation show that most residents don't often bring the wastes that could be charged for. Around 60% only bring these items once or twice a year, and a further 25% never bring these items. Despite this, most residents see any charges as likely to lead to more fly tipping and a disincentive to "doing the right thing". Residents who were supportive of charges often cited charges as a way to reduce closures at HRCs, as closures were seen as the least favourable option. Any system for charging would require a system for electronic payments on site, which would help to minimise delays on site at the busiest periods.
3.6	<p>What additional information is needed to fill any gaps in knowledge about the potential impact of the project?</p>	<p>The extensive annual survey data and the public consultation data shows that the largest group of HRC users are aged over 65 (28% of users), which is higher than the Buckinghamshire population (23% of residents aged over 65¹). The service offered is universal and as such the proposed changes impact all users, but based on the level of usage, it appears that those over 65 are impacted more than</p>

¹ Figure created by discounting residents aged 0-15, who did not complete the consultation, to give an accurate comparison. Data used: <https://bbf.uk.com/news/buckinghamshires-demography-2016>

Equality Impact Assessment

other age groups. It is expected that users over 65 are more likely to visit during the week, than other age groups, and may be more affected by weekday closures. It must be noted that, responses in the consultation did highlight the perceived impact of site closures on older residents who may not feel comfortable travelling the extra distance. All changes will be proactively communicated and possible alternative options given, such as location of alternative sites.

The Council already operates an electronic permit system for some vehicles (introduced in Autumn 2016). The Equalities Impact Assessment for e-permit implementation highlighted that it may negatively impact older residents.

Since the introduction however, there is no evidence of the e-permit system impacting on any protected factor. Permit details and application are based on the Bucks CC website, with the Browse Aloud function, enabling universal access to the site. The Customer service team are also able to issue permits if needed (currently this is around 5 permits per month).

On site electronic payment systems would require compliance with GDPR and additional signage.

Implementation proposals

Revise and update Waste Access and Acceptance Policy following Cabinet decision. The Council's HRC Service provision is set out in the Council's HRC Waste Access and Acceptance Policy (WAAP). WAAP was introduced in **2006** and was last revised in **2016**.

The **policy** details the following: opening days and hours; Buckinghamshire HRC users; District, Town and Parish Councils; charity and other voluntary/non-registered organisations; non-Buckinghamshire households; traders/commercial users; access criteria; banned vehicles; waste electronic-permits (e-permits); types of e-permit waste; acceptance criteria; declaration and records; and General Data Protection Regulation (GDPR).

The **policy's appendices** include details relating to: re-use waste at BCC HRCs; general household waste at BCC HRCs; construction and demolition waste (non-household waste) at BCC HRCs; recycling waste at BCC HRCs; hazardous waste at BCC HRCs; customer feedback; complaints and complements at BCC HRCs; health and safety at BCC HRCs; charities and other voluntary/non-

Equality Impact Assessment

registered organisations at BCC HRCs; and access to sites on foot at BCC.

Policy updates to reflect the options of the HRC Service review changes which the Council will be taking forward:

- **Control of vehicles accessing HRCs** – remains
- **District Councils use of designated HRCs** – remains
- **Charging for some types of waste (*waste outside definition of household waste*) entering HRCs** – new
- **Controls and charging out-of-county** – updated
To be managed part through direct administrative arrangements with neighbouring local authorities and part through the charging of non-household waste.
- **Charities / Parish Council restrictions** – updated
- **Planned weekday closures for some sites** – new

Detailed communications plan will be devised as part of implementation proposals.

Equality Impact Assessment

Part 4: Testing the impact

<p>Within this table, please indicate (✓) whether the project will have a positive, negative or neutral impact across the following nine protected factors and provide relevant comments.</p> <p><i>Note 1: Listing a negative outcome does not mean the project cannot continue.</i></p> <p><i>Note 2: This is an opportunity to identify and address issues for improvement</i></p>						
		Positive Impact	Negative Impact	Neutral Impact	What evidence do you have for this?	Improvement Actions Required
4.1	Age		✓		There is some evidence from the results of the consultation that persons over 65 years are more likely to use the HRCs than other age groups and are more concerned about increased travel times compared to other respondents.	Communications plan, including details of alternative sites
4.2	Disability			✓	No evidence of impacts on this protected factor	
4.3	Gender			✓	No evidence of impacts on this protected factor	
4.4	Marriage / Civil Partnership			✓	No evidence of impacts on this protected factor	
4.5	Pregnancy / Maternity/ Paternity			✓	No evidence of impacts on this protected factor	
4.6	Race			✓	No evidence of impacts on this protected factor	
4.7	Religion/ Belief			✓	No evidence of impacts on this protected factor	
4.8	Sexual Orientation			✓	No evidence of impacts on this protected factor	
4.9	Transgender			✓	No evidence of impacts on this protected factor	
4.10	Carers			✓	No evidence of impacts on this protected factor	

Part 5: Director / Head of Service Statement

<p>I am fully aware of the duties required of Buckinghamshire County Council (BCC) under the Equality Act 2010 and I have read our Equality Strategy.</p> <p>I am satisfied that this Equality Impact Assessment shows that we have made every possible effort to address any actual or potential unlawful discrimination.</p>	Name
	Signature
	Date