

Equality Impact Assessment (EIA)

Part 1: Project details

Project title	Household Recycling Centre Service change implementation
Is this a new or existing document/service?	Existing service
Responsible officer	Gurbaksh Badhan
Job title	Head of Waste Management
Contact phone number	01296 387678
Email	gbadhan@buckscc.gov.uk
Team	Waste Management
Service	Environment
Business Unit	Transport Economy Environment (TEE)
Date started	Initial assessment date – June 2018
Date completed & reviewed	<p><u>March 2019</u></p> <p>Cabinet decision taken 07/01/19. Service changes implemented from 01/04/19.</p> <p><u>August 2019</u></p> <p>Review undertaken and assessment updated where appropriate. Cabinet decision due on 09/09/19.</p>

Part 2: Purpose and Objectives

2.1	What is the purpose of the project or change?	<p><u>March 2019</u></p> <p>The purpose of this project was to review the Household Recycling Centre (HRC) 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 HRC incorporated options modelling, benchmarking and a consultation report.</p> <p>The EIA has been reviewed and updated to reflect the</p>
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		<p>decisions taken by Cabinet on 7th January 2019, with implementation starting on 1st April 2019.</p> <p><u>August 2019</u></p> <p>This EIA has been reviewed in light of the recommendation being proposed to Cabinet on 9th September 2019 – namely to rescind the permanent closure of Burnham HRC, with the Burnham HRC continuing to operate on 5 days a week with closing days being Wednesdays and Thursdays.</p>
<p>2.2</p>	<p>What are the key objectives of the project or change?</p>	<p><u>March 2019</u></p> <p>Service changes, as a result of the work completed on the HRC service review and subsequent Cabinet decision, were:</p> <ul style="list-style-type: none"> • Charging for some types of waste (non household 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 until September 2019 following a detailed financial appraisal of the other savings implemented from 1st April 2019) <p><u>August 2019</u></p> <p>The above HRC service changes were implemented from the 1st April 2019. The recommendation being proposed to Cabinet on 9th September 2019 is to rescind the permanent closure of Burnham HRC. The Burnham HRC will continue to operate on 5 days a week with closing days being Wednesdays and Thursdays. No other HRC service changes are being proposed.</p>
<p>2.3</p>	<p>Which other functions, services or policies may be impacted?</p>	<p><u>March 2019</u></p> <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 service change. • The Customer Contact Centre and other contact channels into the Council will be impacted, as any changes to the HRC service could result in an increase of contact made with the Council. • The fly tipping enforcement team could be impacted if

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		<p>fly tipping incidents were to increase.</p> <p><u>August 2019</u></p> <p>Remains current in relation to all the HRC service changes. No update required.</p>
2.4	<p>Who are the main stakeholders impacted by this project or change?</p>	<p><u>March 2019</u></p> <ul style="list-style-type: none"> • Buckinghamshire residents • FCC Environment (current service provider) • Buckinghamshire District Councils as Waste Collection Authorities (WCAs) <p><u>August 2019</u></p> <p>Remains current in relation to all HRC service changes. No update required.</p>
2.5	<p>Which other stakeholders may be affected by this project or change?</p>	<p><u>March 2019</u></p> <ul style="list-style-type: none"> • Non-Buckinghamshire residents <p><u>August 2019</u></p> <p>Remains current in relation to all HRC service changes. No update required.</p>

Part 3: Data and Research

3.1	<p>What data and research has been used to inform this assessment?</p>	<p><u>March 2019</u></p> <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. In advance of HRC service changes, approved by Cabinet on 7th January 2019, the following was carried out: • 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
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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 2018 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:

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

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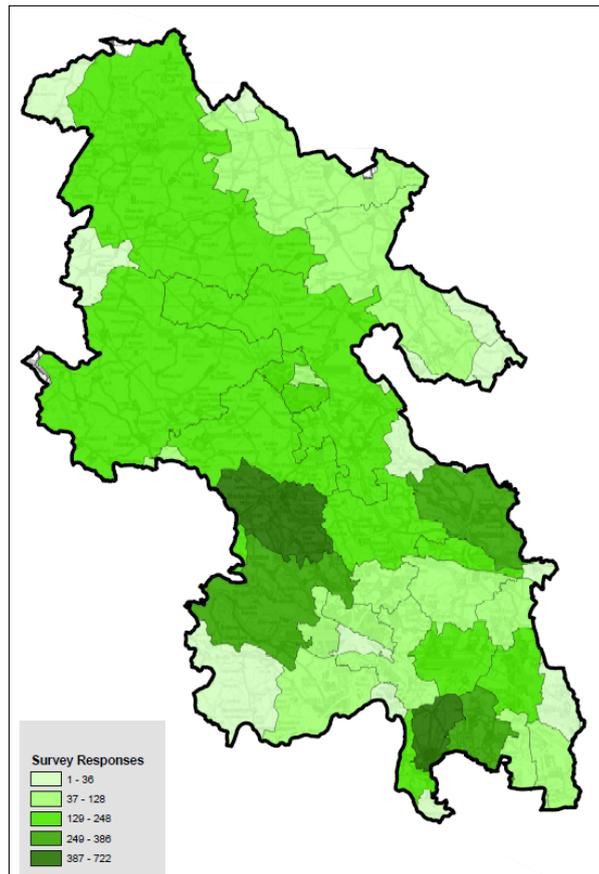


Figure 1 Geographical spread of consultation responses

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 individual (54.3%). There is some evidence that closing on consecutive days may be more supported.

- **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.

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The Council has prepared an HRC performance and financial appraisal of the implemented service changes to allow Cabinet to make its decision regarding Burnham HRC. Please

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		refer to the link to relevant documents at the end of this paper
3.2	Have any complaints on the grounds of discrimination been made in relation to this project?	<p><u>March 2019</u></p> <p>No. The public consultation received over 6,000 responses, which have been collated and were considered by decision makers.</p> <p><u>August 2019</u></p> <p>No. Since implementation in April 2019 no complaints on the grounds of discrimination have been made.</p>
3.3	Please provide evidence of these.	<p><u>March 2019</u></p> <p>n/a</p> <p><u>August 2019</u></p> <p>n/a</p>
3.4	What <u>positive</u> impacts have been established through research findings, consultation and data analysis?	<p><u>March 2019</u></p> <p>Benchmarking data shows the current HRC service is cost effective.</p> <p>The service changes plan to deliver savings in a cost effective way that will benefit Buckinghamshire tax payers.</p> <p><u>August 2019</u></p> <p>If Cabinet proceed as planned from the decision taken in January 2019 and close Burnham permanently from 30th September, then there is no change to the March 2019 statements above. However, if the decision by Cabinet on 9th September 2019 is to rescind and keep Burnham open for 5 days a week, then this will be a positive impact and does not require the impact assessment to be reviewed</p>
3.5	What <u>negative</u> impacts have been established through research findings, consultation and data analysis?	<p><u>March 2019</u></p> <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 - Some residents will have to drive further to use their nearest HRC due the site closures. 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 by site closures. A map detailing the drive times is given in the Cabinet Report.

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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 are occurring).

Bledlow and Burnham travel times considered – 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 alternative site (High Heavens) is 16-20 mins. Residents in Princes Risborough could travel to Aston Clinton which is an estimated travel time of 10-14 mins.

Travel time* from Burnham HRC to alternative sites, if Burnham was to close, Beaconsfield is 10-14 mins and Langley is 16-22 mins.

* Typical times – Average of Google estimated times, taken each day of the week at 10am and 2pm.

- **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 Wednesdays and Thursdays from the 1st April 2019. They will need to visit the nearest alternative site, or visit on another day.
- **Charging for some types of waste** – for all users of the HRC network. There will be an additional cost to residents disposing of certain types of waste. Waste types, such as plasterboard, rubble, soil, asbestos and car tyres will incur a cost to dispose of.
The annual surveys and public consultation show that most residents don't often bring the wastes that will 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.
The system for charging requires a system for electronic payments on site, which will help to minimise delays on site at the busiest periods.

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If Cabinet chooses to make the decision to keep nine sites open then there is a less negative impact due to Burnham HRC not being closed permanently.

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3.6	What additional information is needed to fill any gaps in knowledge about the potential impact of the project?	<p><u>March 2019</u></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 changes impact all users, but based on the level of usage, it appears that those over 65 are impacted more than 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 are being proactively communicated and possible alternative options given, such as location of alternative sites.</p> <p>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.</p> <p>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).</p> <p>On site electronic payment systems will require compliance with General Data Protection Regulation (GDPR) and additional signage.</p> <p>Implementation</p> <p>The Waste Access and Acceptance Policy has been revised and updated following the 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, revision undertaken in 2016 and revised in 2019.</p> <p>The policy details the following: opening days and hours;</p>
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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>

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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.

The **policy's appendixes** 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-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 has been devised as part of implementation delivery.

August 2019

Remains current in relation to all HRC service changes. No update required.

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Part 4: Testing the impact

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. Both positive and negative impacts should be specified where this applies.

Note 1: Listing a negative outcome does not mean the project cannot continue.

Note 2: This is an opportunity to identify and address issues for improvement

		Positive Impact	Negative Impact	Neutral Impact	What evidence do you have for this?	Improvement Actions Required
4.1	Age		✓		<p>March 2019 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.</p> <p>August 2019 If the decision is made by Cabinet to keep Burnham open 5 days a week then this decision will have a positive impact</p>	Communications plan, including details of alternative sites (ongoing)
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	

**someone who provides unpaid care for a family member or friend who is unable to cope without their support. This may be due to illness, disability, frailty, mental health problems or addiction*

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Part 5: Ongoing improvement monitoring

From the improvement actions identified in section 4, this table can be used for monitoring the progress made

5.1	Improvement Actions Required	Detail of progress made against the required improvements
	Communications Plan update – August 2019	<p>The EIA highlighted that the demographics of residents that use the HRCs is older than the Buckinghamshire average. As such, the HRC communications plan addresses the concern that older residents would need to drive to alternative sites. In addition to the wider, ongoing communication actions planned the following actions addressed the possible concerns raised in the EIA:</p> <ul style="list-style-type: none"> • Tailored information was provided to Local Parish Councils, with specific details of alternative sites. Parish Councils are seen as a strong community link and “go to” point for local residents. • HRC site staff handed out business cards at the affected sites which listed the alternative site addresses. Around 40,000 cards were given out, before and after the 1st April implementation launch. • Radio adverts were produced and aired in the affected areas, highlighting the changes. • Adverts in eight popular shopping areas promoted the changes and alternative sites. • Eight local newspaper adverts were also used to promote the changes. <p>The overall communications used to promote the changes used more than 15 different methods of traditional and new media. The actions above are most likely to reach the affected audience, but, other actions must not be discounted as avenues that affected residents may access information.</p> <p>Delivery of the HRC service change communications plan remains ongoing and will be reviewed and adjusted accordingly by the service.</p>

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Part 5: Director Statement

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. I am satisfied that this Equality Impact Assessment shows that we have made every possible effort to address any actual or potential unlawful discrimination.	Name Martin Dickman
	Signature 
	Date 21st March 2019 Reviewed Date 13th August 2019

Link to relevant documents:

- Revision of the Council's Waste Access and Acceptance Policy and Equalities Impact Assessment relating to the Household Recycling Centre service (March 2019) - can be found [here](#)