



Equality Impact Assessment (EqIA)

Template reviewed Nov 2021

The Public Sector Equality Duty (PSED) was introduced as part of the Equality Act 2010, which protects people from discrimination in the workplace, in the provision of services and in wider society.

The duty requires all public bodies to have due regard to the need to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people

Public bodies demonstrate this due regard in different ways, including producing robust equality impact assessments when considering changes to policies and services.

An EqIA enables us to check the potential impacts on residents and employees of our policies, services and projects. It's an opportunity to challenge how we currently do things.

Carrying out an EqIA should not create extra work; it should be part of your normal service planning process. Most of the information required should already be available to you through other work already undertaken e.g. service user monitoring, analysis of complaints and national research.

The purpose of an EqIA is to *take account* of equality as plans develop, to promote and assist the consideration of equalities issues arising in plans and proposals and to ensure that where possible adverse or disproportionate impacts are minimised and positive impacts are maximised. As such where possible an EqIA should be started at the outset of a project/proposal and continually be developed and reviewed until a final proposal is adopted. An EqIA should be used to ensure decision makers have all the information they need regarding potential impacts to ensure they have due regard to the Public Sector Equality Duty when making judgements.

Carrying out EqIAs should be an integral part of policy or service development/change and larger projects may need more than one EqIA if different areas are impacted by the change.

Any project that requires consultation will automatically require an EqIA.

All approved and signed EqIAs are recorded in a central register. Please email your completed draft EqIA to equalities@buckinghamshire.gov.uk. Previous EqIAs can be made available for information upon request. For any questions or if you require support in completing your EqIA please contact Maria Damigos and Natalie Donhou Morley directly.



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Part A (Initial assessment) - Section 1 - Background

Proposal/Brief Title: Change to the Household Recycling Centre (HRC) service model from nine to ten sites

OneDrive link to report/policy: TBC

Related policies: [Waste Access and Acceptance Policy](#)

Date: 6/6/2022

Type of strategy, policy, project or service:

Please tick one of the following:

- Existing
- New or proposed**
- Changing, update or revision
- Other (please explain)

This assessment was created by:

Name: Andrew Jenkins

Job Title: Waste Prevention Team Leader

Email address: Andrew.jenkins@buckinghamshire.gov.uk

Briefly describe the aims and objectives of the proposal below:

We plan to open a new Household Recycling Centre at Bledlow/Princes Risborough. The site will be opened at the same location as a previous site with refurbished equipment and facilities.

The site will operate in the same way as the other HRCs and using the Waste Acceptance and Access Policy with no material change to resident's experience on site. It will open five days a week, closed every Wednesday & Thursday, as do the Aylesbury, Burnham and Chesham.

What outcomes do we want to achieve?

Make waste disposal easier for residents and provide a new location to cater for the medium/long term growth trends in the area.

Does this proposal plan to withdraw a service, activity or presence? No

Please explain your answer: This change proposes an additional service.

Does this proposal plan to reduce a service, activity or presence? No



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Please explain your answer: This change increases access to a service.

Does this proposal plan to introduce, review or change a policy, strategy or procedure?

Yes

Please explain your answer: The Waste Access and Acceptance Policy will be updated. However, this is not a substantial change in policy outcomes, but an amendment to include the new sites details in the policy.

Does this proposal affect service users and/or customers, or the wider community? Yes

Please explain your answer: By adding a new site it will give service users another option for waste disposal and reduce visitor numbers at other sites, albeit by a small margin.

There is also a change to charge users from outside of Buckinghamshire directly for access, where there is no agreement in place with the relevant local authority.

Does this proposal affect employees? No

Please explain your answer: Employees on the site would be FCC Environment employees, not Buckinghamshire Council.

Will employees require training to deliver this proposal? No

Please explain your answer: The skills needed to deliver this project exist already in the contract.

Has any engagement /consultation been carried out, or is planned in the future? No

Please explain your answer: A consultation is not needed for this decision. Engagement with local members is being undertaken prior to the Cabinet decision to help understand any issues/opportunities as a result of the changes. The Council also has information from a prior consultation pertinent to these changes which has helped inform the decision.

Section 2 - Impacts

Please highlight potential impacts (including unintended impacts or consequences) for each protected characteristic*/equality groups below. Where there are negative or positive impacts please give more details of the impact. Where the impacts are unclear please explain why.

Age*

Positive

Negative

Unclear

None

Details: Payments are still required by card. There is some evidence to say that older users may not have access to card payments. Since card payments were introduced in 2019 there have been no substantive issues with older users being unable to pay. Reports from



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site staff and contact with the Council has not shown there to be an issue so far. Pre-paid cards are available with cash deposits if necessary.

Younger users (younger than 17) would not have access to card payments, but they would also not be able to drive to sites, and as such has not presented as an issue.

The introduction of card payments was to reduce cases of fraud, reduce the cost of cash handling to the Council and keep staff safe from potential theft/incidents.

Disability*

Positive

Negative

Unclear

None

Details:

The negative impact does not affect users from Buckinghamshire.

A change in the current policy introduces charges for residents who live outside of Buckinghamshire to use Bledlow HRC.

The charges for non-Buckinghamshire residents, see WAAP Table C4, are based on the size of vehicle bringing the waste. There is no weighbridge on site and estimating volume of waste on a case-by-case basis is challenging and time consuming which would cause delay and congestion for Buckinghamshire residents.

Historic Bledlow HRC site surveys show that around 3% of users are identified as having a disability. The potential for discrimination is also limited to those users who are non-Buckinghamshire residents (applicable for residents of Oxfordshire only) who need a larger vehicle to accommodate their disability. We anticipate that less than 50 visits to Bledlow HRC are likely to be affected each year.

If a user from outside of Buckinghamshire, visiting Bledlow HRC, needed a larger vehicle to accommodate their disability, they would be charged more, for the same amount of waste than other users. Depending on vehicle size and quantity/type of waste the additional cost would be at least £30 per visit. This would be seen as discrimination under s29(2) of the Equality Act which prohibits discrimination in relation to the provision of services.

This issue has been identified and mitigated by introducing a concession for non-Buckinghamshire users using Bledlow HRC only, who need a larger vehicle to accommodate their disability.

How will the concession work?

The user would apply for a digital form, yet to be confirmed in advance of their visit. The user will be asked for proof of the need for a larger vehicle. Council officers will



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approve the concession and issue the digital authorisation to the user before they visit the site.

The user should present the digital authorisation to site staff upon request. The user will be charged based on the approximate volume of waste instead of vehicle size. This would be an estimate by site staff, site staff decision will be final.

Examples of concessions:

1. A user has a large vehicle to accommodate their wheelchair, they only need to dispose of 5 black bags which only quarter fill the large car.

This user is likely to receive a concession and charged the site visit access and acceptance rate of a small car.

2. A user has a small van to accommodate their disability, the van is full of garden waste. No space is taken up with equipment to help accommodate their disability.

This user is unlikely to receive a concession and charged the site visit access and acceptance rate of a small van.

The concession ensures users from outside of Buckinghamshire who need a larger vehicle to accommodate their disability will not be discriminated against because of their disability.

Equally, there is no positive discrimination, as users will only receive a concession if they bring less waste than their vehicle can carry.

The Council will monitor the concessions through:

- Feedback from site staff
- The application process for the concession
- Annual customer satisfaction surveys

There will be a review of the concessions after 6 months to understand the impacts and outcomes of the concession.

The policy and associated charges will be available in an accessible format on the website.

Pregnancy & maternity*

Positive	Negative	Unclear	None
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Details:

Race & Ethnicity*

Positive	Negative	Unclear	None
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Details: We do not believe there will be any significant impacts on users based on their ethnicity, however, the policy is complicated and for those who do not have English as a first language it may be difficult to work out. Communications will help to clarify the



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policy in simple terms, and as per our accessibility guidance different formats can be requested.

Marriage & Civil Partnership*

Positive	Negative	Unclear	None
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Details:

Religion & Belief*

Positive	Negative	Unclear	None
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Details:

Sex*

Positive	Negative	Unclear	None
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Details:

Sexual Orientation*

Positive	Negative	Unclear	None
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Details:

Gender Reassignment*

Positive	Negative	Unclear	None
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Details:

Gender identity

Positive	Negative	Unclear	None
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Details:

Carers

Positive	Negative	Unclear	None
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Details:

Rural isolation

Positive	Negative	Unclear	None
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Details: The proposed site would be closer to access for some residents in the predominately rural area increasing access to services.



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Single parent families

Positive Negative Unclear **None**

Details:

Poverty (social & economic deprivation)

Positive **Negative** Unclear None

Details: The additional cost to users non-Buckinghamshire resident (Oxfordshire resident) visiting Bledlow HRC only, would negatively impact users on low incomes. However, the service offered is available for free in their own administrative area. Whilst the nearest site may be in Buckinghamshire, there is adequate provision of Household Recycling Centres for users to visit a site in their own administrative area, which would be free at point of access. Therefore although this is indicated as a negative for the purposes of the EqIA due to the availability of other non-charging facilities and services it is not considered that it requires further consideration at this time

There is no cost implication to users from Buckinghamshire.

Military families / veterans

Positive Negative Unclear **None**

Details:

Section 3 – Is a full assessment required?

If you have answered yes to any of the initial assessment questions in section 1 of this EqIA, or have indicated a negative or unclear impact in section 2, it is likely you will need to complete part B of the EqIA form. Should you need guidance as to whether a full EqIA is needed at this time please contact Maria Damigos or Natalie Donhou Morley before continuing.

Following completion of part A, is part B completion required?

- Yes
- No
- Not required at this time**

Explain your answer:

The introduction of the service is broadly positive;

- Increased access to rural residents,
- Shorter drive times for some residents
- More choice of which site to visit



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Also, on review it does not impact any protected characteristic negatively. There is a change of policy, but only to reference Bledlow HRC. There is no substantial change to the policy which would affect any Buckinghamshire residents with protected characteristics.

Non-Buckinghamshire residents

The highlighted negative impacts on users from non-Buckinghamshire residents with a disability has been addressed. The concession offered ensures non-Buckinghamshire residents will not pay more if they must use a larger car to accommodate their disability. The concession also ensures there is no positive discrimination either.

The negative impact on poverty is limited to users from non-Buckinghamshire residents who have access to other, free to access, Household Recycling Centres.

There will be a review of the concession and digital application form to better understand the impacts once the changes have been in place for 6 months.

The Council will include clear and consistent communications to local areas outside of Buckinghamshire, working with authorities and organisations to ensure users are aware of the charges prior to their visit. Key information for non-Buckinghamshire residents would be:

- Opening times & Days
- Charges for access and acceptance, including details of waste and vehicle type
- How to apply for concessions in advance
- Referred back to their local administrative authority

Have you completed an DPIA for this project/change? Yes

See Appendix 3 to this decision report.

Section 4 – Sign off (Only complete when NOT completing Part B)

Officer completing this assessment: Andrew Jenkins Date: 15/08/2022

Reviewer – Head of Service: Gurbaksh Badhan Date: 23/08/2022

Equality advice sought from: Maria Damigos & Natalie Donhou Morley Date: 23/08/2022

Service Director sign off: Martin Dickman Date: 23/08/2022

CMT sign off (*if deemed necessary by Service Director*) sign off: (Please insert name) Date:
(Please insert Date)

Next review Date: 6 months from Bledlow HRC opens. Likely to be Q1 2023. Additional reviews will be completed should an impact be identified that has not been anticipated.