

# **EQUALITY IMPACT ASSESSMENTS**

**KENT HOUSEHOLD WASTE  
RECYCLING CENTRES**

**May 2011- February 2012**



**KENT COUNTY COUNCIL**  
**EQUALITY IMPACT ASSESSMENT**

**Directorate: Enterprise and Environment**

**Name of policy, procedure, project or service**

Household Waste Recycling Centre (HWRC) Review

**Type**

*What are you impact assessing, a policy procedure or service?*

The Household Waste Recycling Centre service and its operating policies

**Responsible Owner/ Senior Officer**

*Provide the name of the senior officer or manager responsible for the policy, procedure, project or service*

Caroline Arnold, Head of Waste Management

**Date of Screenings:**

<b>A: Initial screening:</b>	Thursday 18 <sup>th</sup> May 2011	Pages 3 - 9
<b>B: Interim screening:</b>	Tuesday 13 <sup>th</sup> September 2011	Pages 10 - 15
<b>C: Final screening:</b>	Thursday 16 <sup>th</sup> February 2012	Pages 16 - 24

**A: Initial EIA conducted at start of HWRC Review process (May 2011) – prior to development of proposed policies**

**Screening Grid:**

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
<b>Age</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known.  Consideration may need to be given to journey times, physical access to site and use of containers.
<b>Disability</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known.  Consideration may need to be given to journey times, physical access to site and use of containers.  Enforcing exclusion of trade waste users has the potential to ease site congestion improving manoeuvrability.
<b>Gender</b>	No		None	None	
<b>Gender identity</b>	No		None	None	
<b>Race</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known.  Mosaic analysis to be used to determine composition of population to identify dominant languages of minority groups.
<b>Religion or belief</b>	Yes		Unknown	Unknown	Further assessment will be required once the proposals to HWRC services are known.

					Research to understand religious festivals and cultural needs of people living in areas with proposed changes in service.
<b>Sexual orientation</b>	No		None	None	
<b>Pregnancy and maternity</b>	Yes		Unknown	Unknown	Further assessment will be required once the details of changes to HWRC services are known.
<b>Marriage and civil partnership</b>	No		None	None	

## **Part 1: INITIAL SCREENING (May 2011)**

### **Context**

Kent County Council has the statutory responsibility to manage the disposal of municipal waste in Kent. As part of this, the service runs 19 Household Waste Recycling Centres (HWRC) where householders can bring a variety of municipal waste for recycling and disposal. This service has been under scrutiny for some time and a review has been commissioned to examine the shape of future operations to and any efficiency savings.

### **Aims and Objectives**

The aim of the review is to identify the right level of HWRC service for Kent residents at the right cost. The review will include an assessment of the HWRC network in terms of economy (costs and income generation), efficiency (productivity), effectiveness (customer satisfaction, recycling rates, material types and capture) and location.

The review will examine the current provision and location of HWRCs, their operating policies, the potential for increasing income, as well as the options for making the required savings.

### **Beneficiaries**

The intended beneficiaries are householders as users of the Household Waste Recycling Centre service in Kent. A review of HWRC service provision will examine a range of policies. These policies will seek to provide appropriate HWRC services for householders whilst yielding savings.

### **Consultation and data**

In order to understand the customer base currently using the HWRC service, data is to be sourced and collated through the website and face to face surveys at all HWRCs and conducted by KCC Waste Service Officers (WSO). To ensure statistical validity, a threshold has been set requiring a minimum of 200 surveys per site per year, equalling a minimum of 3,800 surveys across the customer base.

### **Potential Impact**

This Equality Impact Assessment (EIA) is an initial screening to indicate potential areas of impact, both positive and negative, to the diverse population of Kent, should any new policy changes be implemented.

Currently five of the Protected Characteristics may potentially be impacted either positively or negatively and will require further research when service delivery models are proposed by Members. This EIA will then be developed to detail the nature of the positive and negative impacts and mitigations.

<b>JUDGEMENT</b>
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**Option 1 – Screening Sufficient** **NO**

**Option 2 – Internal Action Required** **YES**

There is potential for adverse impact on particular groups should service changes be proposed and implemented (see action plan1).

An interim EIA (pages 10 -15) will be conducted once Members have agreed the proposed policy / service changes.

This initial EIA screening has demonstrated the value that further data would bring to inform the interim and full EIAs. This data will be used in conjunction with Mosaic's Kent and Medway segments and afford wider visibility of the equality impacts.

Of particular note is the need to undertake a period of public consultation to gain a better understanding of the impacts that these changes may have on Kent householders.

Whilst the Informal Member Group continues with their review of the HWRC Service, Action Plan 1 (pages 7- 8) will be completed to provide the necessary information to inform the interim EIA and the development and delivery of a public consultation.

**Option 3 – Full Impact Assessment** **NO**

*Only go to full impact assessment if an adverse impact has been identified that will need to undertake further analysis, consultation and action*

Option 3 will be conducted within the interim EIA (page 10) and re-assessed following public consultation / full EIA (page 16).

## Action Plan 1- Initial Equality Impact Assessment (May 2011)


Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
<b>AGE</b>	<p>Further customer insight of age composition of HWRC service users required.</p> <p>Methods of engagement for public consultation may not suit all adults that form our customer base.</p> <p>Identify key groups to consult with.</p>	<p>Sample of customer postcodes to be collected with Mosaic profiling to provide customer segmentation.</p> <p>Use Mosaic data to develop appropriate engagement channels which suit preferences across age ranges – not a one size fits all approach.</p>	<p>To provide customer insight – identify indicative age composition of HWRC service users.</p> <p>To effectively engage with a cross section of ages of adults within the consultation.</p>	Caroline Arnold	September 2011	Achievable through existing resources.
<b>DISABILITY</b>	<p>Accessibility of public consultation documents.</p> <p>Identify key groups to consult with.</p> <p>Consider accessibility to service information for people with print impairments.</p>	<p>Ensure alternative formats are available including Easy Read; helpline number provided; Plain English applied to materials published.</p> <p>Consider use of Talking Newspapers and radio to communicate service information.</p>	<p>Public consultation accessible by all adults.</p> <p>Feedback / lessons learnt from consultation shared within Kent County Council to ensure high quality consultations are delivered to customers.</p> <p>Increase awareness of the HWRC service.</p>	Caroline Arnold	October 2011	TBC

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
<b>RACE &amp; RELIGION OR BELIEF</b>	<p>KCC engagement with minority groups to obtain service feedback.</p> <p>Understanding of minority groups' usage of HWRC services.</p> <p>Identify key groups to consult with.</p>	<p>Equality /diversity training for officers who are required to conduct face to face customer satisfaction surveys at HWRCs.</p> <p>Provide officers with KCC's 'Race, Faith and Culture' toolkit as a reference guide.</p> <p>Sample of customer postcodes to be collected with Mosaic profiling to provide customer segmentation.</p>	<p>To equip officers with appropriate skills, knowledge and understanding, to effectively engage with customers from different cultures and from minority groups, to obtain feedback respectfully and with confidence.</p> <p>To provide customer insight; indicate service use by minority groups.</p>	Caroline Arnold	September 2011	<p>£700 for external trainer.</p> <p>Remaining actions achievable through existing resources.</p>
<b>PREGNANCY OR MATERNITY</b>	<p>To identify areas of Kent where pregnancy and maternity may be more prevalent and / or concentrated and sensible to ensure public consultation is well communicated.</p>	<p>Audience segmentation to understand where HWRCs may have higher than average levels of customers who are pregnant and/ or with small children.</p> <p>Mosaic profiling of customer sample to examine communication preferences for parents who are pregnant and / or have small children.</p>	<p>Inform delivery of public consultation to ensure feedback is gained from those within protected characteristic group.</p> <p>Communication methods selected meet needs and support effective engagement for public consultation.</p>	Caroline Arnold	September 2011	Achievable through existing resources.

## **Initial EIA - Sign Off**

*I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.*

### **Senior Officer**

Signed:   
Date: 18<sup>th</sup> May 2011  
Name: Caroline Arnold  
Job Title: Head of Waste Management

### **Directorate Equality Lead**

Signed:  
Date:  
Name:  
Job Title:

## **B: Interim EIA conducted prior to public consultation of HWRC Policy / service changes (September 2011)**

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### **FULL ASSESSMENT:**

#### **1. Scope of the Assessment**

This assessment sets out to understand more fully, the potential impacts that may result from the proposed policy changes to the HWRC service to householders wishing to dispose of or recycle household waste.

- Stop accepting tyres, gas bottles and asbestos
- Limit building waste to 2 x 30 litre sacks per car
- Stop opening the height barrier except on Saturdays
- Exclude all vans, pick-ups, flat bed vehicles, over-sized recreational vehicles and trailers
- Consider the introduction of a permit scheme for residents in areas bordering other counties
- Close Hawkinge HWRC summer 2013
- Close Richborough HWRC summer 2013

#### **2. Information and data**

The initial screening highlighted improvements that could be made to data and subsequently knowledge about our customers and the potential impacts of service changes upon them. The tasks set out in Action Plan 1 (pages 7-8) have provided valuable information to inform a full EIA assessment prior to public consultation.

*Please note a further EIA (C) will be conducted once the public consultation has been completed.*

#### **HWRC Customer insight:**

Customer insight information has allowed KCC to understand the current customer base for the HWRC service and has also highlighted characteristics of those who are less likely to be service users:

- Those without access to a vehicle
- Elderly and younger people
- Ethnicity – English may not be first language
- Adults who have children and may be a single parent (or have nobody to leave children with do not want to take them to HWRC)
- Householders with no gardens and who have their waste management needs met by kerbside collection schemes
- Transient populations where they are not requiring the service due to limited stay in Kent.

Clearly communities are diverse so you will find pregnant, elderly, disabled people and ethnic minority groups across Kent, however, there are areas where some of these characteristics are more prevalent. This has been considered within this EIA and in

planning the public consultation to ensure proportionate access to information and opportunity to respond to proposals.

### **3. Involvement and Engagement**

Drawing upon data collated and information available to KCC, a consultation engagement plan has been produced to ensure accessibility to the consultation by Kent residents.

Communications have been tailored for householders to factor in elements such as how certain groups of people prefer to be communicated with.

The public consultation will use the following communication channels. Collectively, these will ensure strong coverage across the county for all residents.

- HWRC site signage
- Information handed to HWRC customers at all 19 HWRCs
- Consultation questionnaire posted to sample of householders who are receptive to direct mail
- Postcard signposting consultation online, posted to a sample of householders who are receptive to direct mail and are Internet users
- Gateway information screens across Kent
- Information available at sport clubs, gyms to reach a section of the current customer base
- Press advertisement in leading Kent press titles across Kent
- Older people's forums
- Disability groups / organisation
- Religious networks
- Minority groups – Gypsy and Irish Travellers
- KCC Community engagement officers local contact
- Posters in community facilities e.g. schools, village halls
- KCC web site
- Information to all parish / town councils

## Repeat Screening Grid: Interim EIA (September 2011)

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
<b>Age</b>	Yes		Low	Low	<p>Customer information and KCC data has identified HWRCs where service users are likely to have a higher level of older residents than the Kent average. The consultation will ensure that these people are targeted proportionately and appropriately to engage in the process and obtain feedback.</p> <p>Consideration has been given to waiting times, which may positively impact upon the more elderly customers. The proposed policies would seek to improve waiting times at HWRCs as a reduction in 'trade' vehicles entering the sites will ease congestion.</p> <p>The proposed closure of Hawkinge<sup>1</sup> and Richborough<sup>2</sup> HWRCs – the nearest alternative HWRCs remain within a drive time of 10- 20 minutes which is equitable with other Kent residents.</p>
<b>Disability</b>	Yes		Low	Low	<p>There is likely to be a positive impact for those customers with disabilities where queuing negatively impacts upon them – by restricting 'trade' vehicles, throughput of vehicles will be reduced, resulting in a faster service for the residents. This should also increase manoeuvrability on site.</p>

<sup>1</sup> Drive times for residents in the Hawkinge area will not exceed the 20 minute standard if the site is to close.

<sup>2</sup> The population predicted to be effected by the potential closure of Richborough HWRC amounts to approximately 150 households which equates to 0.02% of Kent residents. These households exhibit the following characteristics: Middle aged people living in rural areas with young teenagers; some older people but active; Low ethnic diversity; Very likely to own vehicle (more than one).

					<p>A low negative impact may be experienced by those who use the Richborough HWRC, as some may need to drive a little further to access the next nearest site. The drive times to the nearest site will not discriminate residents living in the Richborough area, as alternative HWRCs are available within a drive time equitable with other Kent residents.</p> <p>Arrangements will be put in place to cater for residents using adapted vehicles which are over height and require the height barrier to be opened.</p>
<b>Gender</b>	No		None	None	
<b>Gender identity</b>	No		None	None	
<b>Race</b>	Yes		None	Low	<p>Mosaic analysis tells us that ethnic minorities are unlikely to be HWRC service users currently.</p> <p>Mosaic analysis has been used to determine the composition of the Kent population to identify dominant languages of minority groups in relation to HWRC locations. This will be catered for within the public consultation.</p>
<b>Religion or belief</b>	No		None	None	Information has been gained to understand implication of religious festivals and cultural needs of people living in areas with proposed changes in service. As the proposed policies do not alter the time / days that the service is provided, a negative impact has not been assessed.
<b>Sexual orientation</b>	No		None	None	


<p><b>Pregnancy and maternity</b></p>	<p>Yes</p>		<p>Low</p>	<p>Low</p>	<p>Population profile data has been used to identify areas where pregnancy and maternity may be higher than the Kent average, as well as communication preferences.</p> <p>There is likely to be a positive impact where queuing negatively impacts upon them – by restricting ‘trade’ vehicles, throughput of vehicles will be reduced, resulting in a faster service for the residents.</p> <p>A low negative impact may be experienced by those who currently use the Richborough and Hawkinge HWRCs, as some may need to drive a little further to access the next nearest site. The drive times to the nearest site will not discriminate residents living in the Richborough area, as alternative HWRCs are available within a drive time equitable with other Kent residents (please see footnote on page 12).</p>
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## 4. JUDGEMENT

### Interim EIA - Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

### Senior Officer

Signed:   
Date: 13<sup>th</sup> September 2011  
Name: Caroline Arnold  
Job Title: Head of Waste Management

### Directorate Equality Lead

Signed:  
Date:  
Name:  
Job Title

## **C: Part 2 - FULL ASSESSMENT (February 2012)**

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**Name:** Household Waste Recycling Centre (HWRC) Review.

**Responsible Owner/ Senior Officer:** Caroline Arnold, Head of Waste Management

**Date of Full Equality Impact Assessment:** 16<sup>th</sup> February 2012

### **Scope of the Assessment:**

- To review the public consultation responses (following a 10-week consultation period), where a range of new policies for the future operation of the HWRC network were proposed
- To re-evaluate the impacts (positive and negative) on the Protected Characteristics in light of the consultation feedback and identify actions to prevent / limit negative impacts.

### **Information and Data**

#### **Key information / data used in this assessment include:**

- Qualitative feedback from public consultation in relation to protected characteristics:
  - Customer views on proposed policies
  - Waste Management stakeholder views e.g. District Councils
  - From public bodies e.g. Parish Councils
  - Community stakeholders e.g. CPRE
- Quantitative feedback from public consultation in relation to protected characteristics:
  - Customer views on proposed policies
- Statistical information about the consultation in relation to protected characteristics:
  - Response rates
  - Diversity of respondents\*
  - Gender and age\*
  - Mosaic analysis of respondents set against Kent population data relating to Protected Characteristics

*\* Where respondents provided this information*

### **Involvement and Engagement**

Please refer to appendix i – “Household Waste Recycling Centre public consultation delivery” (page 26) which provides comprehensive information concerning the involvement and engagement activity surrounding the review of the HWRC service.

## **Judgement**

The public consultation responses did not reveal any further impacts (negative or positive) upon any of the protected characteristics, which had not already been identified within the initial screening and interim EIA.

## **Action Plan**

The action plan prepared in May 2011 as part of the initial EIA has been fully delivered. Evidence and outcomes of this delivery is provided in table 3 on page 18.

A further action plan (page 21) has been prepared to reflect the potential impacts should Members adopt some, or all of the policies proposed in the HWRC review.

## **Monitoring and Review**

The proposed policies for the HWRC service will be presented to KCC Cabinet on 19<sup>th</sup> March 2012, where a decision will be made to implement, reject or amend each policy.

**Table 3: Record of consultation engagement mechanisms with residents likely to exhibit protected characteristics and response.**

Protected Characteristic	Engagement mechanisms informed by initial EIA screening and interim EIA	Consultation response
Age	<ul style="list-style-type: none"> <li>• Proactive targeting of older residents / HWRC customers (group 1) by direct mail (consultation questionnaire) in the Canterbury, Maidstone and Thanet districts, where proportion of elderly residents is the greatest.</li> <li>• Direct mail was up weighted in Ramsgate, Sandwich and Folkestone areas (due to proposed local HWRC closures), to provide enhanced opportunity to engage.</li> <li>• A further direct mail (information postcard) was sent to older people (group 2) in the Maidstone, Sevenoaks, Tunbridge Wells, Tonbridge and Mailing and Dartford districts – where they are receptive to direct mail and utilise the Internet. This is a separate group of people to those described in Group 1 which have been identified through Mosaic.</li> <li>• Kent wide press advertising provided an engagement opportunity for the most elderly communities in Kent, who are known to be high consumers of local press titles.</li> <li>• In addition, sporting groups such as bowls clubs were provided with consultation information, as it is recognised that this sport attracts an older player.</li> <li>• Information was sent to Older People Forums and associated groups across all 12 districts.</li> <li>• Large print format made available for people with visual impairments.</li> </ul>	<ul style="list-style-type: none"> <li>• Direct mail was selected for older population (group 1) as their preferred communication channel. This audience are unlikely to have access and use the Internet and, therefore, unable to complete an online questionnaire.</li> <li>• The targeted engagement achieved a 47% response rate to the consultation questionnaire sent.</li> <li>• 27% of respondents indicating their age were 65 years and over.</li> </ul>

Protected Characteristic	Engagement mechanisms informed by initial EIA screening and interim EIA	Consultation response
<b>Disability</b>	<ul style="list-style-type: none"> <li>• A range of alternative formats for the consultation questionnaires was provided to cater for diverse needs.</li> <li>• Information was sent to a range of disability groups across Kent.</li> <li>• Information was sent to all KCC Staff Groups for equality and diversity.</li> </ul>	<ul style="list-style-type: none"> <li>• Large print format - 2 requests</li> <li>• Easy Read – 1 requests</li> <li>• Plain English – used throughout the materials</li> <li>• Braille format - no requests</li> <li>• Verbal presentation of questionnaire – 4 requests</li> <li>• Audio format – made available online</li> <li>• 5% of respondents reported to have a disability</li> </ul>
<b>Gender</b>	N/A	<ul style="list-style-type: none"> <li>• 60 % of respondents were male / 36% female</li> </ul>
<b>Gender-identity</b>	N/A	N/A
<b>Race</b>	<ul style="list-style-type: none"> <li>• A direct mail (information postcard) was sent to Mosaic groups more likely to include people from ethnically diverse backgrounds in the Canterbury, Dartford, Gravesham, Maidstone, Shepway, Thanet, Tunbridge Wells and Tonbridge and Malling districts.</li> <li>• Questionnaire made available in alternative languages.</li> <li>• Consultation sent to range of race / religion and minority groups.</li> <li>• In addition, sporting groups such as football, cricket and gyms were provided with consultation information, as it is recognised that these sports and facilities attract users from ethnically diverse backgrounds.</li> </ul>	<ul style="list-style-type: none"> <li>• Alternative languages – no requests</li> <li>• Approximately 8.5% of respondents who provided a postcode belong to a Mosaic group more likely to include ethnically diverse people</li> <li>• Respondents represented 11 ethnic groups</li> </ul>
<b>Religion or belief</b>	<ul style="list-style-type: none"> <li>• See details provided above in ‘race’ section.</li> </ul>	<ul style="list-style-type: none"> <li>• Respondents represented 11 religions / beliefs</li> </ul>
<b>Sexual orientation</b>	N/A	<ul style="list-style-type: none"> <li>• 69% of respondents reported to be heterosexual; 1% gay; 1% bisexual; 29% did not wish to declare</li> </ul>

Protected Characteristic	Engagement mechanisms informed by initial EIA screening and interim EIA	Consultation response
<b>Pregnancy and maternity</b>	<ul style="list-style-type: none"> <li>• Information was displayed at all Kent libraries – people with young children are often users of library services.</li> <li>• Information was displayed and provided at all 9 Kent Gateways – residents more likely to be pregnant or who have young children are thought to be high users of Gateway services.</li> <li>• People with younger families are likely to be consumers of local newspapers. The consultation was advertised across all Kent leading press titles.</li> <li>• Football clubs were provided with consultation information as it is understood that people with young families are members.</li> </ul>	<ul style="list-style-type: none"> <li>• It is estimated that 14% of respondents have young children or are expecting a baby.</li> </ul>
<b>Marriage and civil partnership</b>	N/A	N/A

## Final EIA Action Plan (February 2012)

This action plan has been developed to reflect the potential impacts should Members adopt some or all of the policies proposed in the HWRC review.

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>AGE</b>	Change in operational HWRC policies following a Cabinet decision.	<p>Communicate the outcome of the review and public consultation to older residents.</p> <p>Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with older customers.</p>	<p>Outcome of HWRC Review made available to older people.</p> <p>Implementation prepared and budget secured.</p>	Head of Waste Management	<p>April / May 2012</p> <p>Waste Management (WM) budget – cost TBC</p>
	Possible increase in journey distance and time for some residents who have been using Hawkinge <sup>3</sup> and Richborough HWRCs to date.	<p>Provide comprehensive, targeted and timely communication to older people to support awareness of alternative HWRCs available to them in their locality.</p> <p>Ensure information about all council waste services is accessible to older people to provide them with choice for their waste disposal needs.</p>	<p>Older people receptive to communications delivered.</p> <p>Older residents able to dispose of their waste appropriately.</p> <p>Older people aware of alternative HWRCs and able to locate them easily.</p>		<p>From June 2012</p> <p>Waste Management budget – cost TBC</p>
	Decrease in journey time for residents in Tonbridge and Malling and north Maidstone areas with additional HWRC provided.	<p>Advertising of new HWRC during build phase to inform potential service users of new facility.</p> <p>Promotion of the opening of the new HWRC to older people within the 'catchment' area.</p>	<p>Older people aware of new HWRC, the nature of the service and the location.</p>		<p>Subject to capital programme</p>

<sup>3</sup> Remains within 20 minute drive time, equitable for residents elsewhere in east Kent.

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
	Ensure older people are communicated with appropriately to meet their needs and ensure messages are conveyed appropriately.	Ensure preferred communication channels are utilised to communicate with these target audiences, drawing on Mosaic information and local data.	Communication of key information is received by older people with ease.		To support all delivery. In accordance to the capital programme and existing site improvement plans.
<b>DISABILITY</b>	Change in operational HWRC policies following a Cabinet decision.	<p>Communicate the outcome of the review and public consultation to organisations representing disability.</p> <p>Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with customers who have disabilities.</p>	<p>Outcome of HWRC Review made available to residents with disabilities through representative organisations / groups in Kent.</p> <p>Implementation prepared and budget secured.</p>	Head of Waste Management	<p>April / May 2012</p> <p>Waste Management (WM) budget – cost TBC</p>
	Cabinet approval for HWRC network infrastructure development and improvements, will enable accessibility to be enhanced.	<p>Ensure accessibility for customers with disabilities is fully considered at design stage for new HWRCs and for site improvements at existing HWRCs.</p> <p>Engage with disability groups within Kent to help inform new site design or improvements.</p> <p>Communicate site improvements / design to communities representing disability.</p>	Improved accessibility for customers with disabilities.	Head of Waste Management	To support all delivery. In accordance to the capital programme and existing site improvement plans.


Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
	Accessibility to site for customers with over-height adapted vehicles.	Develop procedure to ensure customers with over-height adapted vehicles are able to access HWRCs at their convenience and for KCC to communicate this appropriately to relevant customers.	Equitable access for customers with disability vehicles requiring entry to HWRCs.		Procedures developed April 2012  Customer engagement from May 2012
	Possible increase in journey distance and time to HWRCs, for some residents who have been using Hawkinge and Richborough HWRCs to date.	Provide comprehensive, targeted and timely communication to disability groups / organisations in Kent Or individuals upon request), to support awareness of alternative HWRCs available in the locality.  Distribute information about all council waste services to disability groups / organisations in Kent, so that people have choices as to how to dispose of their household waste.	Residents with disabilities able to dispose of their waste appropriately.  Residents with disabilities aware of alternative HWRCs and able to locate them easily.		From June 2012  Waste Management budget – cost TBC
<b>RACE</b>	Change in operational HWRC policies following a Cabinet decision.	Ensure that the outcome of the HWRC Review and public consultation is made available in alternative languages and appropriate formats for ethnically diverse residents of Kent.  Develop and deliver an implementation plan for introduction of new operational policies which provides for engagement with ethnically diverse customers.	Outcome of HWRC Review made available to organisations / groups representing ethnic groups in Kent.  Implementation prepared and budget secured.	Head of Waste Management	April / May 2012  Waste Management (WM) budget – cost TBC

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
<b>PREGNANCY AND MATERNITY</b>	Change in operational HWRC policies following a Cabinet decision.	<p>Communicate the outcome of the review and public consultation.</p> <p>Develop and deliver an implementation plan for introduction of new operational policies – with regard to this protected characteristic HWRC site staff will continue to provide pregnant women with assistance for carrying and lifting waste materials, and ensuring children remain in vehicles for safety. Ensure that this is communicated sensitively in customer information.</p>	<p>Outcome of HWRC Review made available.</p> <p>Implementation prepared and budget secured.</p>	Head of Waste Management	<p>April / May 2012</p> <p>Waste Management (WM) budget – cost TBC</p>
	Possible increase in journey distance and time for some residents who have been using Hawkinge and Richborough HWRCs to date.	<p>Provide timely communication to support awareness of alternative HWRCs available in the locality.</p> <p>Ensure information about all council waste services is accessible to residents to provide them with choice for their waste disposal needs.</p>	<p>Pregnant women and / or those with young children are able to dispose of their waste appropriately.</p> <p>Parents aware of alternative HWRCs and able to locate them easily.</p>		<p>From June 2012</p> <p>Waste Management budget – cost TBC</p>
<b>ALL PROTECTED CHARACTERISTICS IDENTIFIED</b>	To monitor customer usage of HWRCs where policies are implemented & identify any further mitigating actions required to prevent & minimise impact upon customers exhibiting these protected characteristics.	<p>To develop and implement monitoring tools.</p> <p>To undertake regular reviews to analyse findings and take action where negative impacts are identified.</p>	Ensure accessibility to service for people previously identified at risk of being negatively impacted.		Summer 2012-ongoing

## **FINAL EIA - Sign Off**

*I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.*

### **Senior Officer**

Signed:   
Date: 21/02/12  
Name: Caroline Arnold  
Job Title: Head of Waste Management

### **Directorate Equality Lead**

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## **APPENDIX i: Household Waste Recycling Centre public consultation delivery**

### **CONSULTATION ENGAGEMENT**

The policies proposed in the consultation have the potential to affect every household in Kent. It was therefore important to devise engagement mechanisms to provide the opportunity for participation equally across Kent communities, being mindful of communication preferences and accessibility of information.

The consultation consisted of a questionnaire, available in both electronic and paper formats. Kent residents were made aware of the consultation and invited to respond using various communication methods to ensure a broad range of target audiences were engaged with in a proportionate manner.

The EIA shaped the engagement and participation mechanisms, identifying protected characteristics which had the potential to be negatively impacted by the proposed policies, as well as ensuring that particular attention was paid to engagement with minority groups in Kent.

### ***MOSAIC ANALYSIS***

Mosaic, a customer segmentation tool, was used to understand the best way to engage with the residents in Kent. Within Kent, a bespoke Mosaic segmentation has been created using county specific data, whereby every postcode and household in Kent is classified as belonging to one of 69 types and 15 groups (Kent and Medway A – M). These groups identify clusters of individuals and households that are as similar as possible to each other, and as different as possible to any other group. They describe the residents of a postcode in terms of their typical demographics, their behaviours, their lifestyle characteristics and their attitudes. Mosaic was used in this instance to understand communication preferences to ensure that residents in Kent were informed about the consultation in a way that they are more likely to be receptive to.

In preparation for the consultation, a sample of postcodes for HWRC users were collated and profiled, to understand the make-up of the current customer base and their communication preferences. The profile of HWRC users was compared with the Mosaic profile of the Kent population as a whole, in order to understand those people more or less likely to use an HWRC user. This supported the development of targeted communication across all Mosaic groups to ensure a representative sample of Kent residents were engaged with.

The following communication approaches were developed and delivered based on Mosaic Analysis:

### ***Direct Mail***

Mosaic was used to identify those residents in Kent more likely to be receptive to direct mail as a communication method. In order to determine the content of the direct mail, likely use of the Internet was also established (i.e. promoting a website would be inappropriate if Internet use was low).

As a result, a paper copy of the consultation questionnaire was sent to a random sample of residents belonging to K&M groups which were likely to be responsive to direct mail but less likely to have access to the internet. Residents were informed on the covering letter that their address had been selected at random and asked them to encourage others to respond also.

A second direct mail which took the form of a postcard with key points about the consultation and how to participate was sent to a sample of Kent households which were likely to be receptive to direct mail, but also likely to have access to the internet. The postcard signposted residents to the online consultation questionnaire whilst also giving them the option to request a paper copy (or alternative formats) if they preferred.

In light of the questionnaire proposing the closure of Hawkinge and Richborough HWRCs, the direct mail was up-weighted in the areas near these two sites.

### ***Sports clubs/ societies***

Mosaic variables were used to understand which sports/ activities specific groups are likely to be interested in. As a result, posters were sent to sports clubs/ societies in Kent in specific areas based on the characteristics of the population in that area. For example, posters were sent to bowls clubs and golf clubs in area in Kent where there is known to be an older population and posters were sent to gyms where the communities are more likely to undertake this kind of activity.

## **OTHER COMMUNICATION APPROACHES**

### ***KCC website***

A dedicated web page ([www.kent.gov.uk/hwrcconsultation](http://www.kent.gov.uk/hwrcconsultation)) was created on the KCC website to provide consultation information and access to the online questionnaire. Furthermore, links to this page were provided on every Waste Management page regarding the HWRCs. An email address was also created specifically for any email correspondence regarding the consultation ([hwrcconsultation@kent.gov.uk](mailto:hwrcconsultation@kent.gov.uk)).

### ***Gateways***

Each of the 9 Kent Gateways were provided with a supply of postcards, posters and paper copies of the consultation questionnaire, in order to give Kent residents another route with which to obtain a questionnaire should they be Gateway users. Gateways with 'information screens' carried information about the consultation.

### ***Libraries***

A poster advertising the consultation along with a number of postcards and paper copies of the questionnaire were provided to each of the 99 KCC Libraries and 11 KCC Mobile Libraries.

### ***Engagement at HWRCs***

Whilst it remained important to ensure that those residents that do not currently use the HWRCs are made aware of the consultation, providing information at the sites themselves direct to service users was very important. A sign advertising the consultation was installed at each of the 19 HWRCs on the 1<sup>st</sup> or 2<sup>nd</sup> of December 2011 and displayed for the full 10 weeks.

Furthermore, between 1<sup>st</sup> December and 4<sup>th</sup> December 2011, Waste Management officers successfully handed 5,500 postcards to HWRC customers promoting the consultation across all 19 HWRCs. These were handed out during the weekdays and weekend to ensure that different audiences were engaged with and at the earliest opportunity within the consultation period.

### ***Press ads***

Mosaic was able to provide an indication of which areas in Kent would be receptive to press advertisements as a communication method. However, it was felt that it would be

more reasonable to run county-wide advertising to achieve the greatest reach, equality of access and achieve greatest value for money. In the week commencing 28<sup>th</sup> November 2011, a press advertisement was placed in all Kent Messenger paid for titles in Kent, as well as Thanet Extra, Sittingbourne Extra and Messenger Extras (formerly Gravesend, Dartford & Swanley Extra) which are free titles (as no dominant paid for title exists in these areas). A press ad was also placed in the Tunbridge Wells Courier and Tonbridge Courier.

### ***KCC community engagement officers***

All 12 KCC Community Engagement Officers were sent an email prior the launch of the consultation to provide them with information should any members of their communities raise the subject at meetings or make an enquiry.

### ***Key stakeholders***

As well as communicating with individual residents of Kent, key stakeholders were also engaged with to encourage them to contribute to the consultation process. The following stakeholders were engaged with:

- All Kent parish and town councils were sent a paper copy of the questionnaire for the 1<sup>st</sup> December 2011 and were asked to make their residents aware of the consultation. Feedback was encouraged as individuals or as a combined response of the whole parish. Included within this was the Kent Association of Local Councils.
- Waste Managers from all 12 Kent district councils and Medway Council were provided with a paper and electronic copy of the questionnaire and encouraged to respond to proposals via email.
- The Environment Agency was provided with a paper copy of the questionnaire and encouraged to respond to proposals via email.
- A paper copy of the questionnaire was also sent to KCC waste contractors encouraging them to respond via email.
- Kent Fire and Rescue Service were also approached.

## **EQUALITY CONSIDERATIONS**

### **Equality groups**

Kent County Council is committed to ensuring that current and potential service users will not be discriminated against on the grounds of their social circumstances or background, such as gender, race, colour, ethnic origin, religion or belief, disability, gender identity, sexual orientation or age. As a result, a letter and / or e-mail was sent to over 150 equalities groups across the county to inform them of the consultation and to ask them to circulate the information to members of their groups / communities. These groups were informed that responses were welcome from individuals or as a group/ organisation. The following groups were contacted:

- Age groups, including all age forums in Kent
- BME groups
- Disability groups
- Gender groups
- Refugee groups
- Religion groups
- Sexuality groups.

Furthermore, postcards were provided to influential members of the Gypsy and Irish Traveller communities to disseminate amongst their communities as it was felt that these had not been represented elsewhere.

All four KCC staff groups (Rainbow, Unite, Level Playing Field and Greenhouse) were sent an e-mail with the consultation information, again encouraging them to circulate the information to their members.

### **Alternative formats**

Prior to the launch of the consultation, the consultation questionnaire was produced in alternative formats:

- Easy Read;
- Large Print;
- Audio format; and
- Braille.

Alternative language formats would have been accommodated if required, however, no requests were received.