

Annex 5

EQUALITY IMPACT ASSESSMENT

**KCC Waste Management Waste
Disposal Strategy**

(2017-2035)

March 2016

Revised: November 2016



KENT COUNTY COUNCIL

EQUALITY IMPACT ASSESSMENT

Directorate: Growth, Environment and Transport

Name of policy, procedure, project or service:

Waste Management Strategy

Assessment of service:

Kent County Council (KCC) operates as the Waste Disposal Authority (WDA). The 12 District/Borough/City Councils of Kent operate as the Waste Collection Authorities (WCAs). KCC arranges the recycling/disposal of waste collected from households by the WCAs. In addition KCC provide Household Waste Recycling Centres (HWRCs) in accordance with the Environmental Protection Act 1990 (EPA).

EPA Section 51: Functions of waste disposal authorities

(1) It shall be the duty of each waste disposal authority to arrange:

(b) For places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited.

Responsible Owner/ Senior Officer

Hannah Allard, Business Development Team Leader

Date of Screenings:

A: Initial screening: 29th January 2016

B: Post consultation screening: 17th November 2016

C: Interim screening:

D: Final screening:

Version	Author	Date	Comment
1	Casey Holland	29/01/2016	Initial draft
2	Casey Holland	25/02/2016	Second draft following feedback from equality and diversity team.
3	Hannah Allard	02/03/2016	Amendments
4	Casey Holland	04/03/2016	Further amends and additional information added
5	Casey Holland	17/11/2016	Updates made following the 2016 consultation to sections; Screening, Context, Aims and Objectives and Involvement and Engagement.

Date of Screening

1. **Initial screening:** 29th January 2016- To consider impacts of a Waste Management Disposal Strategy including its Ambition, principles and objectives, and to inform delivery of resultant customer engagement and consultation.
2. **Post consultation screening:** 17th November 2017 – to incorporate updates following the consultation.

Please note: The Strategy and therefore this EqlA do not attempt to set out the detail of how the ambition, priorities, and objectives will be achieved.

However, following approval of the strategy an implementation plan and subsequent business cases will do this, with further public consultation and **supporting in-depth EqlAs** undertaken as required

Initial EqIA screening conducted for Waste Disposal Strategy: ambition, priorities and supporting-objectives

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	
Age	No	Yes	Low	None	<p>There are several examples of promoting equal opportunities and positive impacts through the delivery of the strategy for customers who belong to this protected characteristic;</p> <p>Priority 3- Innovation and Change: The services we design and provide will be resilient through accommodating change and growth.</p> <p>Objective B: <i>Household Waste Recycling Centres and Waste Transfer Stations will be located where the evidence shows they need to be.</i></p> <p>Where journey times and site locations have negatively affected elderly customers to date, a data led approach to infrastructure planning and minimising drive times to reasonable levels</p>

				<p>will improve access to services.</p> <p>Priority 4- HWRC Service Delivery: We will provide a value for money service, which meets the needs of our customers.</p> <p>Access and availability</p> <p>Objective B: <i>HWRCs will be open when the evidence shows they need to be.</i></p> <p>A data led approach to determining service operating times will ensure elderly residents are able to access these at a time that is reasonable and practical.</p> <p>Priority 5- Customer service: We will provide an accessible service whilst encouraging customers to reuse and recycle, and let people know what happens to their waste.</p> <p>Customer Service and Feedback</p> <p>Objective A: <i>Work with the companies that manage our HWRCs to ensure high levels of customer service and evaluate and monitor customer feedback.</i></p>
--	--	--	--	--

				<p>As part of this Strategy, Waste Management will ensure that customers are able to feedback on its service in a variety of ways that are accessible and appropriate for those with age-related communication issues, such as through face-to-face surveys.</p> <p>Equalities</p> <p>Objective C: <i>Ensure that all residents are able to access our HWRCs and receive a positive and consistent service.</i></p> <p>Through its implementation, the strategy seeks to ensure that staff will have the knowledge and skills to communicate and support customers at the HWRCs, who may need more help due to age related issues.</p> <p>Communicating with our customers:</p> <p>Objective G: <i>Work as part of the KRP to encourage reuse and recycling through targeted campaigns, understanding how people like to receive information.</i></p> <p>Customer communications will be data-led, to ensure that the methods used to deliver</p>
--	--	--	--	---

				<p>messages and campaigns are directed to the correct people in the correct ways, appreciating the preferences of older customers and how they like to receive information.</p> <p>Consultation considerations</p> <p>It is recognised and understood that engagement materials and channels selected to communication the strategy, must meet the needs of older people – a one-size fits all approach is not sufficient or appropriate.</p> <p>Information will be available in large print and where appropriate in an audio format where older people have visual impairments.</p>
Disability	No	Yes	Low	<p>There are several examples of promoting equal opportunities for those that fall within this protected characteristic and positive impacts through the delivery of the strategy;</p> <p>Priority 3- Innovation and Change: The services we design and provide will be resilient through accommodating change and growth.</p> <p>Objective B: <i>Household Waste Recycling Centres and Waste</i></p>

				<p><i>Transfer Stations will be located where the evidence shows they need to be.</i></p> <p>Where journey times and site locations have negatively affected disabled customers to date, a data led approach to infrastructure planning and minimising drive times to reasonable levels will improve access to services.</p> <p>Priority 4- HWRC Service Delivery: We will provide a value for money service, which meets the needs of our customers.</p> <p>Access and availability</p> <p>Objective B: <i>HWRCs will be open when the evidence shows they need to be.</i></p> <p>A data led approach to determining service operating times will ensure disabled residents are able to access these at a time that is reasonable and practical.</p> <p>Priority 5- Customer service: We will provide an accessible service whilst encouraging customers to reuse and recycle, and let people know what happens to their waste.</p>
--	--	--	--	--

				<p>Customer Service and Feedback</p> <p>Objective A: <i>Work with the companies that manage our HWRCs to ensure high levels of customer service and evaluate and monitor customer feedback.</i></p> <p>As part of this Strategy, Waste Management will ensure that customers are able to feedback on its service in a variety of ways that are accessible and appropriate for those with disability related communication issues or restrictions, such as online.</p> <p>Equalities</p> <p>Objective C: <i>Ensure that all residents are able to access our HWRCs and receive a positive and consistent service.</i></p> <p>Through its implementation, the strategy seeks to ensure that staff will have the knowledge and skills to communicate with and support customers at the HWRCs, who may need more help due to a disability.</p>
--	--	--	--	--

				<p>Communicating with our customers:</p> <p>Objective G: <i>Work as part of the KRP to encourage reuse and recycling through targeted campaigns, understanding how people like to receive information.</i></p> <p>Customer communications will be data-led, to ensure that the methods used to deliver messages and campaigns are directed to the correct people in the correct ways, appreciating the preferences of disabled customers and how they like to receive information.</p> <p>Consultation considerations</p> <p>It is recognised and understood that engagement materials and channels selected to communication the strategy, must meet the needs of older people – a one-size fits all approach is not sufficient or appropriate.</p> <p>Information will be available in large print, braille and where appropriate in an audio format where disabled people have visual impairments. Easy read documents will also be made available to those who require them.</p>
--	--	--	--	--

Gender	No	No	None	None	
Gender identity	No	No	None	None	
Race	No	Yes	Low	None	<p>Equal opportunities may be promoted and positive impacts seen through the delivery of the strategy for customers that fall within this protected characteristic;</p> <p>Priority 5- Customer service: We will provide an accessible service whilst encouraging customers to reuse and recycle, and let people know what happens to their waste.</p> <p>Equalities</p> <p>Objective C: <i>Ensure that all residents are able to access our HWRCs and receive a positive and consistent service.</i></p> <p>Through its implementation, the strategy seeks to ensure that staff will have the knowledge and skills to communicate and support customers at the HWRCs.</p>

					<p>Communicating with our customers:</p> <p>Objective G: <i>Work as part of the KRP to encourage reuse and recycling through targeted campaigns, understanding how people like to receive information.</i></p> <p>Customer communications will be data-led, to ensure that the methods used to deliver messages and campaigns are directed to the correct people in the correct ways, appreciating the preferences of our customers and how they like to receive information, making sure it is available in a range of languages where appropriate.</p> <p>Consultation considerations</p> <p>It is recognised and understood that engagement materials and channels selected to communication the strategy, must meet the needs of older people – a one-size fits all approach is not sufficient or appropriate.</p> <p>Information regarding the strategy and its related documents will be available in alternative languages where requested.</p>
Religion or belief	No	No	None	None	

Sexual orientation	No	No	None	None	
Pregnancy and maternity	No	No	None	None	

Part 1: INITIAL SCREENING

Context, aims and objectives

KCC Waste Management operates within a two-tier system as the WDA, for receiving and disposing or onward processing of Kent's household waste.

This waste is collected by the district and borough councils as the WCAs or delivered directly by householders to HWRC's around the County.

It is the statutory responsibility of the WDA to provide a Household Waste Recycling Centre service to residents in accordance with the Environmental Protection Act 1990;

EPA Section 51: Functions of waste disposal authorities

(1) It shall be the duty of each waste disposal authority to arrange:

(b) For places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited.

KCC currently operate 18 HWRCs around the County.

In addition to providing a waste disposal service for Kent, KCC waste management also has responsibility for a number of other related activities.

The waste strategy outlines the ambition for KCC Waste Management for the next 20 years, and as such six major principles have been identified with a number of underlying key objectives, to help us to achieve this ambition.

The strategy will be supported by an evidence base document.

There are a number of key drivers, which have influenced and identified a need for a waste strategy;

- **Population and Housing**

The population in Kent has been predicated to increase by 17% from 2016 to 2031, resulting in a projected increase of 20% of household waste. This is likely to have impacts on services KCC provides county-wide including the functions of KCC as the WDA.

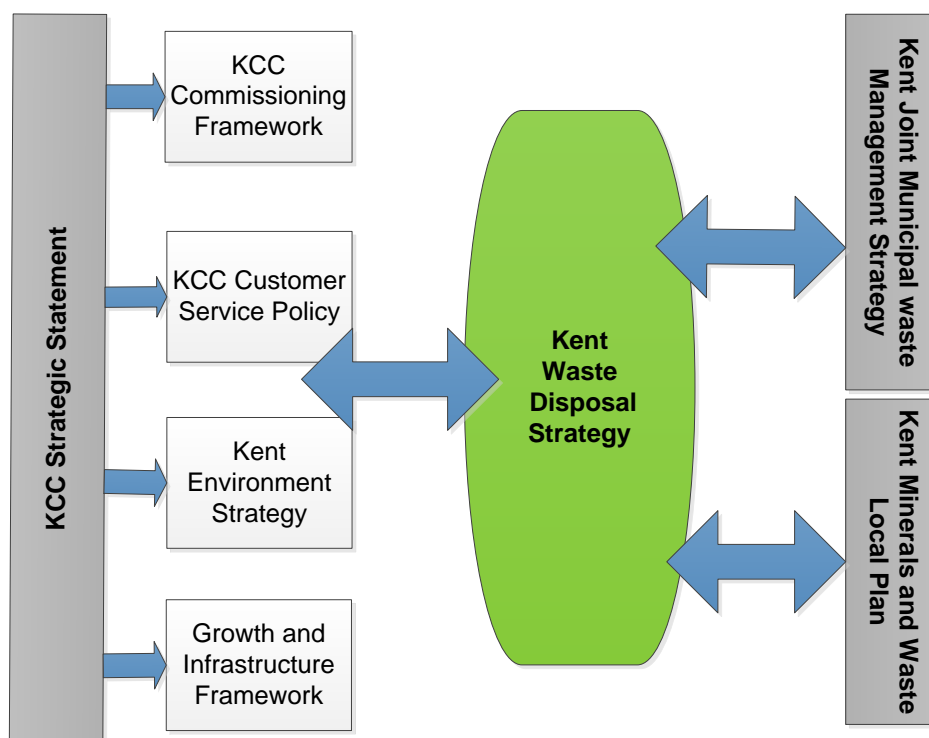
- **Doing more with less**

Delivery of this strategy has the potential to find efficiencies, savings and income allowing the service to develop and evolve.

- **Legislation and targets**

Waste services are influenced primarily by legislation, targets and requirements that are passed down from the European Union and transposed in to national law, policies and strategies. Details of key legislation can be found in the Evidence Base document.

The KCC WDA Strategy will link to a number of other documents Some of these are Corporate documents and others Countywide. These are illustrated below;



**The Kent Minerals and Waste Local Plan is a separate strategy document produced by KCC as the Waste Planning Authority. It provides an overarching strategy and planning policies for the management of all waste streams, not just household waste.*

This Strategy does not attempt to set out the detail of how the ambition and outcomes will be achieved but following approval of the strategy an

implementation plan and subsequent business cases will do this, with further public consultation and supporting EqlAs undertaken as required.

Beneficiaries:

- The residents of Kent through;
 - the services provided by KCC Waste Management being accessible, fit for purpose and provide value for money.
 - Reduced environmental and climate change impacts, with waste prevention as the ultimate outcome both environmentally and financially.
- Kent businesses and SMEs who will benefit from a more robust and intelligence led commissioning and procurement process for waste services.
- The district and borough councils as the WCAs who will benefit from enhanced joint working practices and improvements to services.
- Our current HWRC Contractors as providers of the customer facing services of KCC as the WDA, through optimised services and enhanced working relationships.
- Other Waste Disposal Authorities (WDAs) as we work collaboratively to understand where opportunities may exist for joint service provision or improvements to the mutual benefit of all.

Information and data

Kent Profile

The initial screening has recognised that Age, Disability and Race characteristics may be positively affected by the development of the Waste Disposal Strategy.

Kent is the largest non-metropolitan local authority area in England with a resident population of 1,463,740 people (2011 Census).

Over the past 10 years Kent's population has grown faster than the national average. The population of Kent has grown by 11% between 2004 and 2014, above the average both for the South East (9.2%) and for England (8.3%).

Age

Overall, the age profile of Kent residents is similar to that of England. However, Kent does have a greater proportion of young people aged 5 -19 years and of people aged 45+ years than the England average. Just under a fifth of Kent's population is of retirement age (65+). Kent has an aging population. Forecasts show that the number of 65+ year olds is forecast to increase by 55% between 2013 and 2033, yet the proportion of population aged under 65 is only forecast to increase by 6.9%.

Disability

81.6% of Kent residents describe their health as being very good or good and 17.6% of Kent's population have an illness or condition which limits their day to day activities in some way. The number of Kent residents who are claiming disability benefits is 115,306 (7.6%). This is higher than the South East region (6.4%) but slightly lower than the national figure (8%).

Race

The largest ethnic group in Kent is White. 93.7% of all residents are of white ethnic origin, and 6.6% are of Black Minority Ethnic (BME) origin. The largest single BME group in Kent is Indian representing 1.2% of the total population.

HWRC Customer Profile

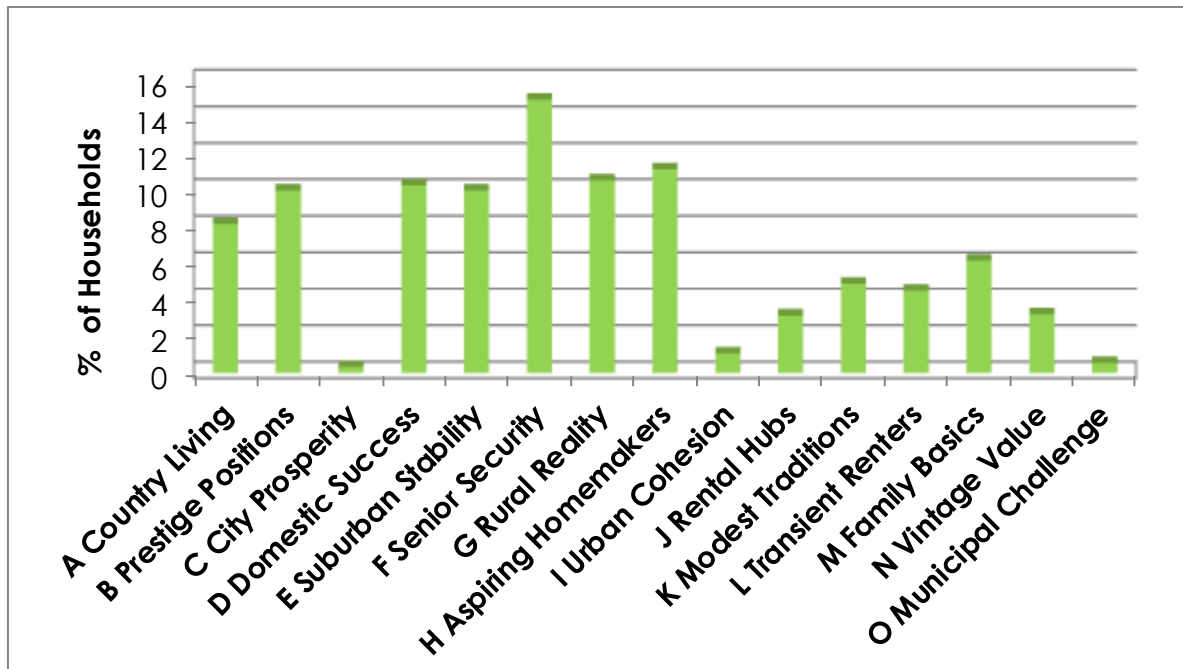
This EqIA draws upon existing service delivery data and previous EqIA assessment examining particular aspects of customer service for the provision of HWRCs:

- Household Waste Recycling Centre Service (2/2015WM)

Customer satisfaction surveys are undertaken by a surveying company on behalf of KCC Waste Management across all 18 HWRCs (approx. 195 surveys per site). Surveys are carried out on a yearly basis at two seasonal sample points in April and October. 'About you', protected characteristic information is gathered from customers who wish to disclose age, gender, ethnicity and disability.

By collecting this information, it enables us to understand more about our customer base and helps to plan services and inform changes. The customer satisfaction survey also collects respondents' postcodes which is used to gain a better understanding of our customers through customer profiling software (MOSAIC) analysis.

The graph below reflects the overall profile of customers using the 18 HWRCs across the County.



The Graph that the most common customer group using the HWRC are Group F- Senior Security.



Key Features

- Elderly singles and couples
- Homeowners
- Comfortable homes
- Additional pensions above state
- Don't like new Technology
- Low mileage Drivers



Communication preferences



Telephone



Post

When undertaking changes at specific HWRCs as part of the implementation of the Waste Strategy, this customer data will be drawn upon to help inform any changes and communication requirements, and will be subject to specific EqlAs.

Involvement and engagement

Prior to public consultation, feedback on the strategy was gathered from a number of sources to assist in the development of the ambition, principles and objectives. These included;

- A waste consultancy company was appointed to contribute to the development of the Strategy, to help facilitate discussion and thinking, and to provide additional capacity and bring an independent perspective.
- Internal consultation with Waste Management officers, the strategy development group and the steering group.
- Through meetings and workshops with the district and borough councils, their officers and Members, in collaboration with the Kent Resource Partnership (KRP).
- Through the Member Task and Finish Group to consider approaches and draft recommendations to be made to the Cabinet Member and subsequently the Environment and Transport Cabinet Committee.
- Meetings with the HWRC providers to introduce the strategy and garner initial thoughts.

Consultation on the strategy will be undertaken in summer 2016, for a period of 12 weeks.

Information will be circulated through our key stakeholders and partners, which includes Kent residents, the district and borough councils, parish councils and our contractors. It will also be circulated through appropriate equality and diversity groups.

Other key consultees include; HWRC Providers (current), the market (potential providers), internal KCC Groups and service teams as appropriate, local business (regarding trade waste), parish councils, neighbouring local Authorities (including Medway), other WDAs, Environment Agency, Kent Fire and Rescue Service, Kent Police, and WRAP.

The consultation will need to ensure that the strategy is accessible for specifically disabled, age and race characteristics who may not have the opportunity to consult on the strategy through traditional methods.

Update Post-Consultation 2016 Screening

The draft strategy was open for a twelve-week consultation between 11th July 2016 and 2nd October 2016.

In accordance with the EqIA Action Plan (Page 23), an e-mail was sent to 100 equalities groups across the County to inform them of the consultation and to invite their organisation to comment.

Groups were also asked to disseminate the information to their service users, as appropriate and an electronic copy of the poster attached to the email to display, again where appropriate. The following groups were contacted:

- Age groups, including all age forums in Kent
- BME groups
- Health and Disability groups
- Religious groups

The KCC Staff Groups representing these groups above were also sent an e-mail with the consultation information, again encouraging them to circulate the information to their members.

Alternative formats of the questionnaire were available on request (alternative languages, Easy read, Large Print, Audio Format and Braille). However, no requests were received.

This EqlA was reviewed after the consultation to enable KCC to respond to any new issues that arose during the consultation and to ensure no groups were disadvantaged.

Feedback from the consultation has been incorporated into amends and changes to the strategy, and have informed the updates which have been made to this EqlA.

Potential Impact

Adverse Impact:

No adverse impacts were noted for the introduction of this Waste Disposal Strategy. Individual EqlAs will be undertaken as necessary for individual projects at implementation phase.

Positive Impacts:

It has been identified that Age, Disability and Race characteristics may be positively affected by the development of the Waste Disposal Strategy.

Specific projects at implementation will be subject to individual EqlAs at implementation phase.

JUDGEMENT

Option 1 – Screening Sufficient - YES

Option 2 – Internal Action Required - YES

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

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:  Name: Hannah Allard
Job Title: Business Development Team Leader Date: 25/11/2016

DMT Member

Signed:  Name: David Beaver
Job Title: Head of Waste Management Date: 25/11/2016

Director

Signed:  Name: Roger Wilkin
Job Title: Director of Highways, Transportation and Waste Date: 25/11/2016

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
All	Ensure all relevant projects as part of the strategy delivery implementation plan are subject to individual EqIA's prior to any further consultation in 2017	All EqIAs undertaken	All impacts identified and mitigated against	Project leads within the implementation plan – TBC in 2017	Commence in 2017	N/A
Age, Disability, Race and Belief	Barrier to accessing the information for the Consultation	The consultation will need to ensure the strategy is accessible for specifically disabled, age and race protected characteristics whom may not have the opportunity to consult on the strategy through	Everyone is able to respond to the consultation	Waste Management Team	July 2016	Accounted for within strategy development budget

		<p>traditional methods.</p> <p>This will be through;</p> <ul style="list-style-type: none">a. Circulation of the consultation to relevant equality groupsb. Alternative formats made available upon request e.g. large print, Easy Read, Braille, Audio, alternative languages				
--	--	---	--	--	--	--