

June 2018

**Kent County Council
Equality Analysis/ Impact Assessment (EqIA)**

Directorate/ Service:

Name of decision, policy, procedure, project or service: Acting on the REPIR (Radiation (Emergency Preparedness and Public Information) Regulations) 2019 Legislation, including an update of the KCC Dungeness B Nuclear Power Station OffSite Emergency Plan

Responsible Owner/ Senior Officer: Adam Feacey

Version: 0.7

Author: Laura Newman

Summary and recommendations of equality analysis/impact assessment.

- **Context**
The KCC Dungeness B Offsite Nuclear Power Station Emergency Plan is being updated in line with the new REPIR 2019 Legislation. If the legislative requirements identify new sites, these will also require offsite plans.
- **Aims and Objectives**
Issues identified as requiring attention will be resolved through KCC Resilience and Emergency Planning Service and the Kent Resilience Forum Dungeness B Sub-group.
- **Summary of equality impact**

Adverse Equality Impact Rating Low

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment concerning **REPIR 2019**. I agree with risk rating and the actions to mitigate any adverse impact(s) that has /have been identified.

Head of Service

Signed:

Name: Mike Overbeke

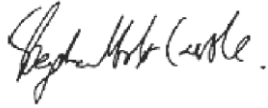


Job Title: Group Head – Public Protection

Date: 26/09/19

DMT Member

Signed:



Name: Stephanie Holt-Castle

Job Title: Interim Director, Environment, Planning and Enforcement Date: 27/09/2019

Updated 27/09/2019

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Part 1 Screening

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

The Dungeness B Nuclear Power Station Off-Site Emergency Plan includes the procedures that would be taken if there is a nuclear emergency at the site, which includes instructions that anyone affected should take stable iodine tablets, however there is a list of medical conditions for which people should not take the tablets, and these are stated within the plan.

These medical reasons do not count as disabilities

- Hypocomplementemic vasculitis
- dermatitis herpetiformis
- Ever been treated for any kidney or adrenal disease
- Ever been treated for thyrotoxicosis
- Taking any of the following medications: Quinidine, Captopril, Enalapril, Amiloride, Triamterene, Bendrofluzide

The plan states that if individuals are affected by any of these medical conditions, this should be discussed with a doctor. Members of the public within the DEPZ would have received prior information from the operator regarding countermeasures and liaising with a doctor for allergies / specific medical conditions. The plan does not include information on what alternative measures are available to these people as this is a medical issue for their doctor.

An action has been incorporated into the action plan to cover this issue.

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Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence

<p>Age</p>				<p>The Dungeness Nuclear Power Station is located within Romney Marsh county council division. 37.1% of residents in Romney Marsh are aged 65+, compared to 20% of Kent residents and 18.3% of UK residents.</p> <p>The Offsite Emergency Plan includes procedures that will take place if an incident occurs at Dungeness B Nuclear Power Station, resulting in a radiation incident. One aspect of this planning that could have a specific effect on older people, is the planned evacuation procedures.</p> <p>Precautions should be</p>
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				<p>taken to ensure that the elderly are effectively able to be evacuated, and that we are aware of them.</p> <p>The KRF Vulnerable People and Communities in Emergencies Plan is currently being updated and will be released in March 2020, which will include protocol to ensure all protected groups are accurately considered and planned for in an emergency.</p> <p>KCC would utilise KCC systems from CYPE & Adult Social Care to identify vulnerable service users and communities. As part of the multiagency response NHS and voluntary agencies would also assist in identifying vulnerable service users.</p>
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				<p>There is a chance that as further REPIR 19 consequence reports are released, the requirement for further offsite emergency plans is identified. If this occurs, the same analysis and precautions will take place for these plans, to ensure that any potential issues for elderly people are mitigated.</p> <p>If welfare centres are required, The Children Act requires that carers (in the welfare centres) working with unaccompanied children under the age of 16 must have an up-to-date DBS check.</p>
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Disability				Overall, 28.9% of the Romney Marsh county council division population are described as having their day-to-day activities limited due to disabilities (14.9% limited a lot, 14%
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				<p>limited a little). This compares to 17.6% of the Kent population (8% limited a lot, 9.6% limited a little) and 17.9% of England and Wales.</p> <p>The Offsite Emergency Plan contains details of how we would respond to a radiation incident at Dungeness B Nuclear Power Station.</p> <p>An aspect of the plan that could affect people with a disability is the evacuation procedures.</p> <p>KCC systems from CYPE & Adult Social Care as well as NHS and voluntary agencies would assist in identifying vulnerable service users. There is of course a risk of some people with a disability not</p>
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				being known to the organisations and
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				<p>this will be further considered in the development of the Kent Resilience Forum Vulnerable People and Communities in Emergencies Plan that is currently being updated and will be released in March 2020, which will include protocol to ensure all protected groups are accurately considered and planned for in an emergency.</p> <p>Additionally, specific arrangements for communicating with vulnerable people and hard-to-reach groups can be found in the Identifying Vulnerable People in an Emergency Plan, on the KRF page of Resilience Direct.</p>
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				If welfare centres are required, The Marsh
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				Academy and Brockhill Academy have been pre identified. These centres have completed their risk assessments and been approved as being accessible for those with disabilities.
Sex				If welfare centres are required, The Marsh Academy and Brockhill Academy have been pre identified, specific arrangements can be made if specific groups or individuals require bespoke care interventions.
Gender identity/ Transgender				None

<p>Race</p>				<p>Of the Romney Marsh county council division population:</p> <p>98.6% are white compared to 93.7% of Kent.</p>
				<p>0.8% are mixed / multiple ethnic groups compared to 1.5% of Kent.</p> <p>0.4% are Asian compared to 3.3% of Kent.</p> <p>0.1% are black / African / Caribbean compared to 1.1% of Kent.</p> <p>0.1% are of another ethnic group compared to 0.5% of Kent.</p> <p>The KRF Welfare Centre guidance confirms that all dietary requirements will be catered for.</p>

<p>Religion and Belief</p>				<p>Of the Romney Marsh county council division population:</p> <p>70.2% are Christian compared to 62.5% of Kent.</p> <p>0.2% Buddhist compared</p>
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				<p>to 0.5% of Kent.</p> <p>0.2% compared to 0.7% of Kent.</p> <p>0.1% are Jewish compared to 0.1% of Kent.</p> <p>0.3% are Muslim compared to 1% of Kent.</p> <p>21.7 have no religion compared to 26.8% of Kent.</p> <p>The KRF Welfare Guidance explains that Interpreting resources may be available from KCC or borough / district councils, and some welfare centre staff who are multi-lingual may also be able to assist.</p> <p>The recognition of cultural and faith factors within the caring response to incidents is important. The</p>
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				<p>coordination of the pastoral, cultural and faith response is the responsibility of KCC, who will work with the 24-hour Critical Incident Chaplains service to fulfil this role. Further advice on a range of cultural issues can be accessed via KCC's Adult Social Care & Health and Children, Young People and Education directorates. Specific advice and support in relation to gypsy and traveller and communities may be sought through the KCC Gypsy and Traveller Unit</p>
Sexual Orientation				None

<p>Pregnancy and Maternity</p>			<p>The plan states that “pregnant women with active hyperthyroidism must not take potassium iodate because of the risk of foetal thyroid</p>	<p>The Dungeness B Nuclear Power Station Offsite Emergency Plan includes specific advice to pregnant and breastfeeding woman and states, it is safe to take</p>
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			<p>blockage”.</p> <p>The plan does not include information available for woman about what else they can do, if they cannot take the required medication, e.g. whether there is an alternative medicine. An action has been developed in the below action plan to resolve this</p> <p>If the REPP19 identify more sites as well as Dungeness, these same precautions will be incorporated into the required plans.</p>	<p>potassium iodate tablets (apart from the reason stated separately). Extra information is included in the plan, regarding monitoring the baby after the tablets have been taken etc.</p> <p>If the REPP19 identify more sites as well as Dungeness, these same precautions will be incorporated into the required plans.</p>
Marriage and Civil Partnerships				None

Carer's Responsibilities				If there was a radiation incident at the power station, there would be
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				<p>restricted areas that the public are not allowed to enter, and communications messages would advise the public to stay inside. Therefore, considerations would have to be made for those who require care, that are in these zones and whose carers are out of the zones, and vice versa.</p> <p>The Dungeness B Nuclear Power Station Offsite Emergency Plan includes a list of care homes within a 20km zone, this will be extended to 30km following the new regulations</p> <p>KCC would utilise KCC systems from CYPE & Adult Social Care to identify vulnerable service users and communities and as part of the multi-</p>
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				<p>agency response NHS and voluntary agencies would also assist in identifying vulnerable service users.</p> <p>If the REPP19 identify more sites in addition to Dungeness B, these same precautions will be incorporated into the required plans.</p>
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Part 2

Equality Analysis /Impact Assessment

Protected groups

(Who will be directly or indirectly negatively affected by the changes?)

Information and Data used to carry out your assessment

(Please list your data source and if you have it provide a link to source. Please highlight any gaps)

Who have you involved consulted and engaged?

(Please list stakeholders)

Analysis

(What have you found out and what does it tell you about the impacted protected groups? What did you stakeholders, including protected groups tell you?)

Adverse Impact,

(What is the effect on the protected group? Please state mitigation in the action plan)

Positive Impact:

(Please highlight any positive impacts in relation to protected groups)

JUDGEMENT

Set out below the implications you have found from your assessment for the relevant protected group(s). If any negative impacts can be justified, please clearly explain why. Identify the option to address the impact. There are four possible options:

- **No major change** - no potential for discrimination and all opportunities to promote equality have been taken
- **Adjust and continue** - adjust to remove barriers or better promote equality
- **Continue the policy** - despite potential for adverse impact or missed opportunity. Set out the justifications: there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements.
- **Stop and remove the policy** – policy shows actual or potential unlawful discrimination it must be stopped and removed or changed

Internal Action Required

YES/NO

There is potential for adverse impact on particular groups and we have found scope to improve the proposal...

(Complete the Action Plan- please include dates for monitoring and review)

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Equality Impact Analysis/Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
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<p>Not applicable to a specific characteristic</p>	<p>The Dungeness B Nuclear Power Station Off-Site Emergency Plan includes the procedures that would be taken if there is a radiological emergency at the site, which includes instructions that anyone affected should take potassium iodine tablets. However, there is a list of medical conditions for which people should not take the tablets, and these are stated within the plan These are:</p> <ul style="list-style-type: none"> - Iodine allergy - Hypocomplementemic vasculitis or dermatitis herpetiformis - Ever been treated for any kidney or adrenal disease - Ever been treated for thyrotoxicosis - Ever taken: quinidine, captopril, enalapril, 	<p>The Dungeness task and finish group will discuss this issue and seek to agree any alternative advice when they meet on the 16th October.</p>	<p>Liaison with the required partners will resolve the identified issues, then the plan can be amended to incorporate this information.</p>	<p>Dungeness Task and Finish Group</p>	<p>16th October</p>	<p>N/A</p>
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	amiloride, triamterene, or bendrofluzide.					
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<p>Pregnancy and Maternity</p>	<p>The plan states that “pregnant women with active hyperthyroidism must not take potassium iodate because of the risk of foetal thyroid blockage”.</p> <p>Is there information available for these woman about what else they can do, if they cannot take the required medication?</p> <p>The plan includes specific advice to pregnant and breastfeeding woman, it is safe to take potassium iodate tablets (apart from the reason stated above). Extra information is included in the plan, regarding monitoring the baby after the tablets have been taken etc.</p>	<p>The Dungeness task and finish group will discuss this issue and an alternative for these people should be decided when they meet on the 16th October.</p>	<p>Liaison with the required partners should resolve the identified issues, then the plan can be amended to incorporate this information.</p>	<p>Dungeness Task and Finish Group</p>	<p>16th October</p>	<p>N/A</p>

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Have the actions been included in your business/ service plan? (If no please state how the actions will be monitored)

Yes/No

Appendix

Please include relevant data sets

Please forward a final signed electronic copy and Word version to the Equality Team by emailing diversityinfo@kent.gov.uk

If the activity will be subject to a Cabinet decision, the EqIA must be submitted to committee services along with the relevant Cabinet report. Your EqIA should also be published.

The original signed hard copy and electronic copy should be kept with your team for audit purposes.