

EQUALITY IMPACT ASSESSMENT

**Charging for non-household waste at
Household Waste Recycling Centres**

August 2018 – November 2018



KENT COUNTY COUNCIL

EQUALITY IMPACT ASSESSMENT

Directorate: Growth, Environment and Transport

Name of policy, procedure, project or service:

Charging for non-household waste at Household Waste Recycling Centres (HWRCs)

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

David Beaver, Head of Waste Management and Business Services

Date of Screenings:

A: Initial screening: 1st March 2018

B: Interim screening: None

C: Final screening: 27th November 2018

Version	Author	Date	Comment
1	Casey Holland	01/03/2018	Initial draft
2	Casey Holland	16/04/2018	Update following proposal amends
3	Casey Holland	08/08/18	Update following stakeholder feedback
4	Hannah Allard	27/11/2018	Final screening post consultation

Date of Screening

- 1. Initial screening:** 1st March 2018 - To consider recommendation to introduce a Policy to charge for non-household waste at Household Waste Recycling Centres (HWRCs).
- 2. Final screening:** 27th November 2018 – 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.

Initial EqIA screening conducted for charging for non-household waste at the Household Waste Recycling Centres (HWRCs)

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	Yes	No	Low	Low	<p>Non-household waste charges</p> <ul style="list-style-type: none"> Where legislation permits, introduce charges for the disposal on non-household waste items; Soil rubble and hardcore and Plasterboard. Maintain charges for tyre disposal as under the current policy. <p>Details of Impact: Introducing material charges and limits has the potential to lessen vehicle movements on site, improving manoeuvrability, access to containers and easing congestion on site.</p> <p>Introducing charges will mean consideration will be made to payment mechanisms employed on site to ensure these are accessible for everyone.</p>

Disability	Yes	No	Low	Low	<p>Non-household waste charges</p> <ul style="list-style-type: none"> Where legislation permits, introduce charges for the disposal on non-household waste items; Soil rubble and hardcore and Plasterboard. Maintain charges for tyre disposal as under the current policy. <p>Details of Impact: Introducing material charges and limits has the potential to lessen vehicle movements on site, improving manoeuvrability, access to containers and easing congestion on site.</p> <p>Introducing charges will mean consideration will be made to payment mechanisms employed on site to ensure these are accessible for everyone.</p>
Gender	No	No	None	None	
Gender identity	No	No	None	None	
Race	Yes	No	Low	None	<p>Non-household waste charges</p> <ul style="list-style-type: none"> Where legislation permits, introduce charges for the disposal on non-household waste items; Soil rubble and hardcore and Plasterboard. Maintain charges for tyre disposal as under the current policy. <p>Details of Impact: Introducing charges will mean consideration will be</p>

					made to ensure information about charges and payment mechanisms employed on site to ensure these are accessible for everyone.
Religion or belief	No	No	None	None	
Sexual orientation	No	No	None	None	
Pregnancy and maternity	No	No	None	None	

NOTE: The Literacy Trust states that 1 in 6 people in the UK live without literacy. Although literacy is not recognised as a disability or included as a Protected Characteristic, it is important that consideration is made to support residents with low or no literacy where there may be a negative impact through service changes.

Part 1: INITIAL SCREENING (August 2018)

Context, aims and objectives

KCC Waste Management operates within a two-tier system as the Waste Disposal Authority (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 Waste Collection Authorities (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.

The Kent Waste Disposal Strategy (2017-2035) was adopted in February 2017, and sets out the overarching ambition for KCC Waste Management.

To deliver the Strategy, the Waste Management Team have commenced Phase One Implementation which encompasses an analytical and data led review of the Household Waste Recycling Centre and Enforcement Policies, resulting in a recommendation for a policy change.

This recommendation will be subject to Public Consultation in Autumn 2018, before any changes are formally agreed and adopted by the Cabinet Member.

This EqIA considers the impact of charging residents for non-household waste disposal at the HWRCs.

Beneficiaries:

- Kent Householders as users of the Household Waste Recycling Centres and Kent taxpayers through the services provided by KCC Waste Management being accessible, fit for purpose and providing value for money.

Information and data

Kent Profile

The initial screening has recognised that there may be a low negative impact on Age, Disability and Race characteristics through the implementation of the proposed policy change.

With a resident population of around 1.6 million, Kent has the largest population of all of the English counties.

Kent's population grew by 10.9% between 2006 and 2016 and is forecast to increase by more than 20% between 2016 and 2036.

Age

Kent has an aging population. Forecasts show that the number of 65+ year olds is forecast to increase by 57.5% between 2016 and 2036, yet the proportion of population aged under 65 is only forecast to increase by 13.5%.

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 122,230 (8.0%). This is higher than the South East region (6.6%) but slightly lower than the national figure (8.2%).

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 assessments undertaken:

- Waste Disposal Strategy (1/2016WM)

Customer satisfaction surveys are undertaken by a surveying company on behalf of KCC Waste Management across all 18 HWRCs (approx. 400 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.

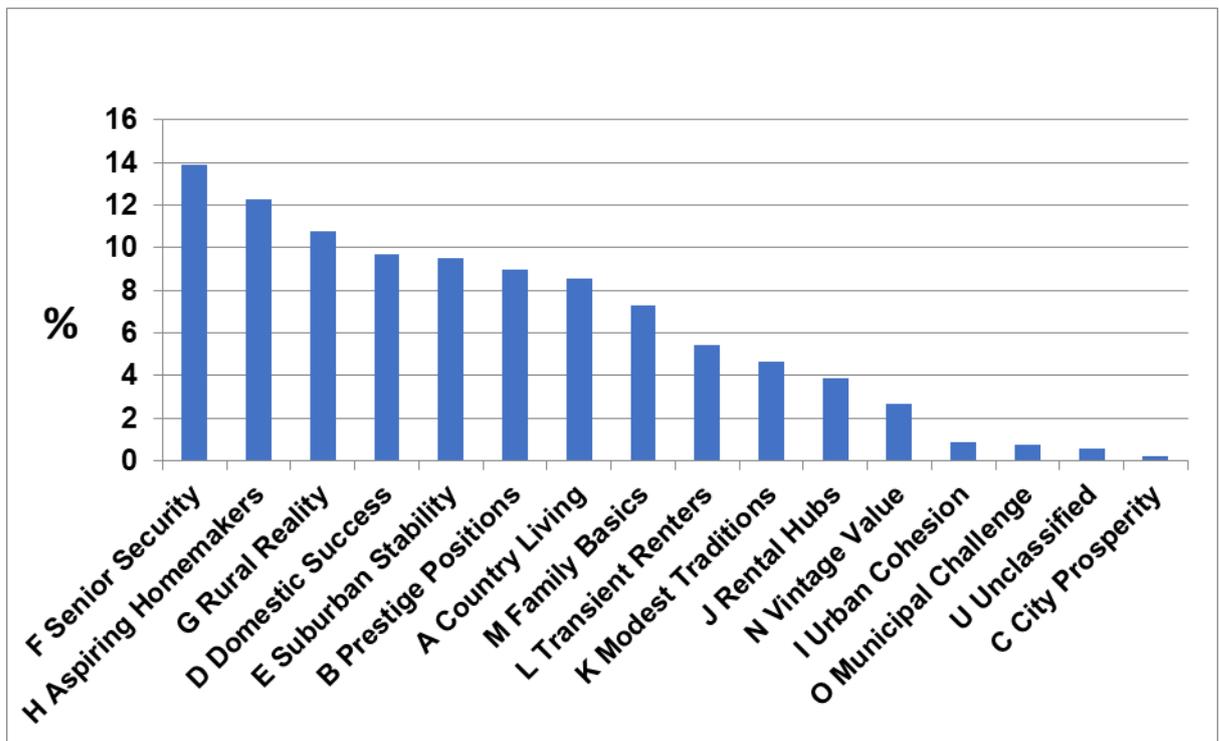
Surveys undertaken in 2017¹, suggest that;

- Almost half (49%) of HWRC customers are aged 56 and over.
- 38% of HWRC customers are female, 62% male.
- 96% of customers identify themselves as English/ Welsh/ Scottish/ Northern Irish or British.
- 5% of HWRC customers consider themselves to be disabled.

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 for Kent of customers using the 18 HWRCs across the County.

¹ 7,126 Surveys were undertaken in 2017.



The Graph that the most common customer group using the HWRC are Group F- Senior Security (14%).



Key Features

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



Communication preferences

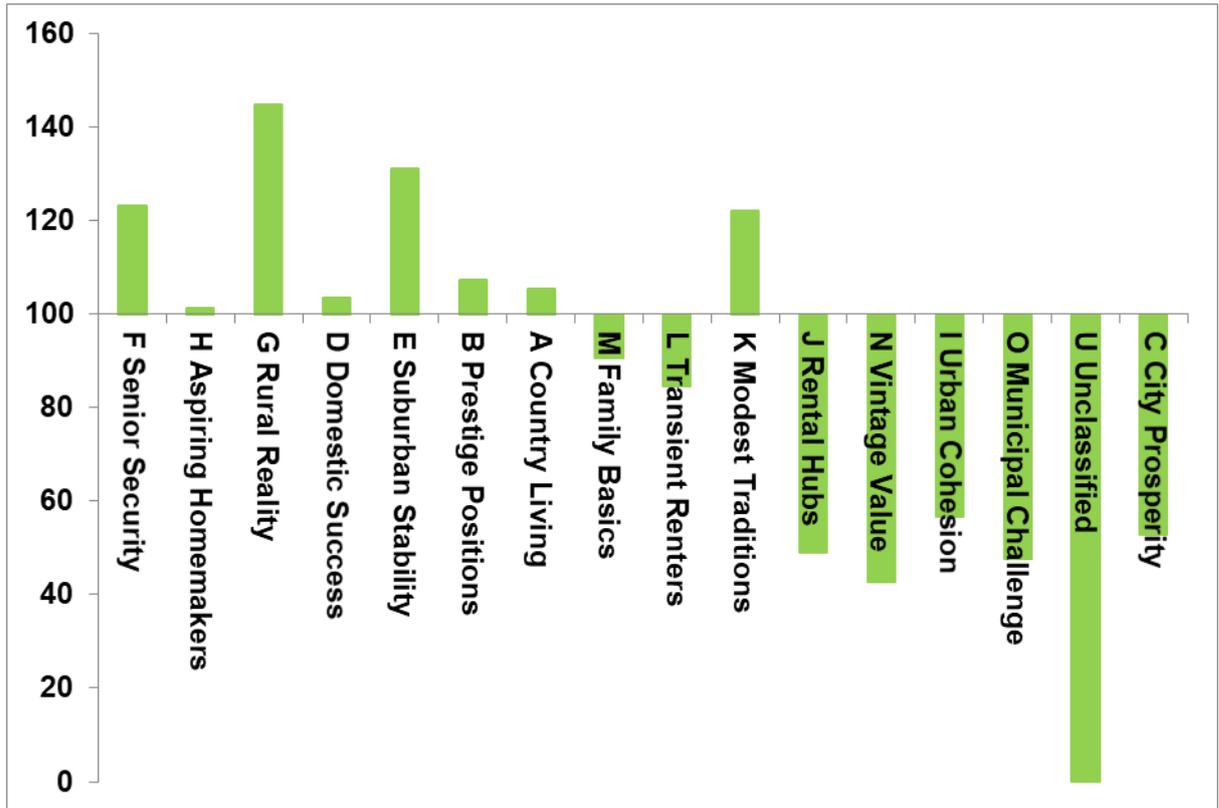


Telephone



Post

The table below compares the profile of customers using the HWRCs with the overall profile for Kent. This enables the HWRC customer profile to be compared relatively with the rest of Kent. An index score of 100 suggests that the profile of HWRC customers is around average when compared with the profile of households in the whole of Kent. An index of more than 100 suggests that the group is over-represented amongst the customer population whilst an index of below 100 suggests that the group is under-represented.



The table shows that the most popular customer group, 'Group F- Senior Security', is over represented at the HWRC's, with above average visitors from this group.

Conversely, when compared with the number of residents in Kent in 'Group C- City Prosperity' is under-represented as a customer group using the HWRCs.

This is not surprising when you consider that Kent has an aging population.

Overall, all groups in Kent are either under or over represented in terms of HWRC usage.

Involvement and engagement

Any recommendation made will be subject to public consultation. A subsequent EqIA has been undertaken to understand the impacts of undertaking consultation and make consideration to engagement methods used and ensure equal opportunity to respond (please see EqIA 1/2018- available on request).

Prior to taking the recommendations out to public consultation, they have been shared with a number of key stakeholders in order to gain their views and feedback. These include;

- Internal consultation with Waste Management officers, and the waste strategy steering group.
- Through meetings with the district and borough councils, in collaboration with the Kent Resource Partnership (KRP).
- Through the Informal Members Group, prior to recommendations being made to the Cabinet Member and subsequently the Environment and Transport Cabinet Committee.
- Meetings with the HWRC providers to share findings.

In addition to public engagement for Kent residents, information will be circulated through our key stakeholders and partners, 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, internal KCC Groups and service teams as appropriate, local business (regarding trade waste), parish councils, neighbouring local Authorities (including Medway), other WDAs, Environment Agency, and WRAP.

The consultation will need to be specifically accessible for disabled, age and race characteristics who may not have the opportunity to engage and respond through traditional methods.

Potential Impact

Adverse Impact:

Currently three of the Protected Characteristics may be potentially negatively impacted by a number of the recommendations proposed;

- 1) Age
- 2) Disability
- 3) Race

The screening table (pages 4-26) details these impacts and the internal actions and activities that will be undertaken in these instances, however it is recognised that

further assessment will need to be carried out once service changes are fully known.

Positive Impacts:

Currently two of the Protected Characteristics may be potentially positively impacted by this activity;

- 1) Age
- 2) Disability

The screening table (pages 4-26) details these impacts, however it is recognised that further assessment will need to be carried out once service changes are fully known.

JUDGEMENT

Option 1 – Screening Sufficient - YES

Option 2 – Internal Action Required – NO (*subsequent EQIAs to be undertaken prior to any implementation*)

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: David Beaver

Job Title: Head of Waste Management Date: _____

Director

Signed: _____ Name: Simon Jones

Job Title: Director of Highways,
Transportation and
Waste Date: _____

Part 2: Final Screening (November 2018)

Context, aims and objectives

On 6 September 2018, an 8-week consultation commenced, closing on 1 November 2018 to gain views from the public and stakeholders regarding introducing charging for the following streams of non-household waste at the KCC Household Waste Recycling Centres:

- Soil, rubble and hardcore
- Plasterboard

This final screening has been undertaken 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.

Beneficiaries:

- Kent Householders as users of the Household Waste Recycling Centres and Kent taxpayers through the services provided by KCC Waste Management being accessible, fit for purpose and providing value for money.

Information and data

In total, 2,841 consultation responses were received. This comprised of 2,757 online questionnaires, 62 paper copies (3 of which were scanned and sent) and a further 22 representations by email or letter from members of the public, and other stakeholders.

As part of the consultation questionnaire, respondents were asked for any comments about the EqIA. The key comments were:

- Concerns regarding those on low incomes being able to afford the disposal
- Waste disposal must be made easy for older people and people with disabilities, including for those reliant on family and friends to be able to access the HWRCs
- Concerns regarding differing abilities to be able to lift bags dependent on weight
- Comments regarding specific HWRCs
- Views that an EqIA is not applicable or required for this consultation, 'waste of time'

In the initial screening, age, disability and race were identified as being potentially impacted upon as a result of the proposed charging. The public consultation

responses did not reveal any further impacts to these protected characteristics or any others. However, some further issues were identified that were not-related to any one protected characteristic, namely the impact of disposal costs to those on low income and the ability of people to lift different weights of bags. These issues have been included within the 'action plan'.

Involvement and engagement

Please refer to the Post Consultation Analysis Report, which provides comprehensive information concerning the involvement and engagement activity of the consultation. Table 1, provides a record of consultation engagement mechanisms informed by the initial EqIA screening and **EqIA 1/2018** (available on request - which was undertaken to make consideration to engagement methods used in consultation).

Potential Impact

Adverse Impact:

After reviewing the consultation responses, three of the Protected Characteristics remain as being potentially negatively impacted;

1. Age
2. Disability
3. Race

The initial screening table (pages 4-26) details these impacts and the final action plan details actions to be taken.

Positive Impacts:

Furthermore, two of the Protected Characteristics still may be potentially positively impacted by this activity, again as identified within the initial screening table;

- 1) Age
- 2) Disability

Table 1: Record of consultation engagement mechanisms with residents identified as being potentially impacted as a result of the proposal and/or consultation engagement itself

Protected characteristic	Engagement mechanism informed by initial EqlA screening (both 1/2018 and 2/2018)	Consultation response
Age	<ul style="list-style-type: none"> • Information will be provided for display at libraries, Gateways and HWRCs, with postcards to take away with details of how to participate in consultation activities. • Information will be shared with KCC Equality groups for distribution to age-related organisations and groups in Kent. • Face to face engagement will take place in HWRCs and other accessible locations as Mosaic suggests that older people are more receptive to this form of communication. • Hard copies of consultation questionnaires will be available at Household Waste Recycling Centres, council offices, some central libraries, and on request from Waste Management (via telephone, post or email) with a Freepost address for hard returns. • Large print formats of printed materials will be made available on request from Waste Management (via telephone, post or email) with a Freepost address for hard returns, should older people have visual impairments. 	<ul style="list-style-type: none"> • Large print – no requests • A number of hard copy requests received – primarily via the KCC contact centre • Age profile of those that responded: 65+ represents 31% 35 – 64 represents 63% 0 – 34 represents 7% • Emails sent to 19 age related organisations and groups in Kent
Disability	<ul style="list-style-type: none"> • All communication will be subject to a Plain English test. • A mixture of auditory and visual communication will be used, recognising that one channel limits customers' accessibility if they have a visual or auditory impairment. • Information will be shared with KCC Equality groups for distribution to disability organisations and groups in Kent. • Information will be provided for display at libraries, Gateways and HWRCs, with postcards to take away with details of how to participate in consultations. • Face to face engagement will take place in HWRCs and other accessible locations. • A range of alternative formats of printed materials including large print, Easy 	<ul style="list-style-type: none"> • Large print – no requests • Easy Read – 2 responses returned • Plain English – used throughout materials • Braille format – no requests • Audio format – no requests • Emails sent to 41 health and disability groups in Kent • 8% of respondents report to have a disability

	Read, Braille and audio will be made available on request from Waste Management (via telephone, post or email) with a Freepost address for hard returns, disabled people have visual impairments.	
Gender	N/A	
Gender identity	N/A	
Race	<ul style="list-style-type: none"> Information will be shared with KCC Equality groups for distribution to race-related organisations and groups in Kent. Engagement materials and consultation questionnaires will be made available in alternative languages on request from Waste Management (via telephone, post or email) with a Freepost address. 	<ul style="list-style-type: none"> Alternative languages – no requests Respondents represented 12 ethnic groups Emails sent to race/ religion/ minority groups in Kent
Religion or belief	N/A	N/A
Sexual orientation	N/A	N/A
Pregnancy and maternity	N/A	N/A

Final EqIA Action Plan (November 2018)

This action plan has been developed to reflect the potential impacts should a Member Decision be taken to adopt charging for the non-household waste materials consulted upon.

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale / Cost implications
AGE	Communication of change to operational policies Ensure older people are communicated with appropriately to meet their needs and ensure messages are conveyed appropriately	Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with older customers – to replicate communication methods employed for consultation engagement e.g. face to face opportunities	Outcome of HWRC Review made available to older people.	Head of Waste Management	Ensure significant time for communication in advance of implementation – date TBC Waste Management budget – cost TBC
	Equal access to payment method	Payment for the disposal of non-household waste materials will be card payment only. Ensure payment terminal/ device is wireless to avoid the need for customers to access buildings.	Payment system that can be accessed by all customers.	Head of Waste Management	Ensure all payment technology is in place in advance of implementation. Waste Management budget cost TBC
	Strong customer	As with overarching operational	HWRC site staff trained and	Head of	Ongoing

	care which meets the needs of all customers	delivery of the HWRCs, ensure site staff are trained to ensure they are equipped with knowledge and skills to meet the need of all customers.	high level of customer service provided.	Waste Management	
DISABILITY	<p>Communication of change to operational policies</p> <p>Ensure people with disabilities are communicated with appropriately to meet their needs and ensure messages are conveyed appropriately</p>	Develop and deliver an implementation plan for introduction of new operational policies, which provides for engagement with customers who have disabilities - to replicate communication methods employed for consultation engagement e.g. alternative formats of any communication materials available on request	Outcome of HWRC Review made available to people with disabilities	Head of Waste Management	<p>Ensure significant time for communication in advance of implementation – date TBC</p> <p>Waste Management budget – cost TBC</p> <p>Ongoing</p>
	<p>Equal access to payment method</p> <p>Strong customer</p>	<p>Payment for the disposal of non-household waste materials will be card payment only. Ensure payment terminal/ device is wireless to avoid the need for customers to access buildings.</p> <p>As with overarching operational</p>	<p>Payment system that can be accessed by all customers.</p> <p>HWRC site staff trained and</p>	<p>Head of Waste Management</p> <p>Head of</p>	<p>Ensure all payment technology is in place in advance of implementation.</p> <p>Waste Management budget cost TBC</p> <p>Ongoing</p>

	care which meets the needs of all customers	delivery of the HWRCs, ensure site staff are trained to ensure they are equipped with knowledge and skills to meet the need of all customers.	high level of customer service provided.	Waste Management	
RACE	<p>Communication of change to operational policies</p> <p>Ensure people are communicated with appropriately to meet their needs and ensure messages are conveyed appropriately</p>	<p>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 - to replicate communication methods employed for consultation engagement e.g. alternative languages of any communication materials available on request</p>	<p>Outcome of HWRC Review made available to organisations / groups representing ethnic groups in Kent.</p>	Head of Waste Management	<p>Ensure significant time for communication in advance of implementation – date TBC</p> <p>Waste Management budget – cost TBC</p>
Other 'equality' issues not protected characteristic specific	<p>Ability to lift different weights of bags. A 5 bag/ item per day limit has been applied. However, it was identified through the consultation that some people may be unfairly disadvantaged if they are unable to</p>	<p>Site staff to provide help to those that need it, inline with their own health and safety procedures.</p> <p>To ensure those who cannot lift heavy bags are not disadvantaged, HWRC staff will be able to use their discretion in cases where several 'part bags' are used as a result of weight lifting challenges.</p>	<p>Customers are not disadvantaged as a result of being unable to lift heavy bags.</p>	Head of Waste Management	<p>From implementation</p>

	<p>lift heavy bags.</p> <p>Although not related to a protected characteristic, there was a concern identified through the consultation that people on lower incomes may not be able to afford the disposal.</p>	<p>None – whilst there is a recognised need for residents to dispose of non-household waste items on occasion, KCC do not legally have to provide a disposal outlet for these materials. However, a reasonable charge mechanism has been proposed to be able to continue to provide the service.</p>	<p>A modest fee is introduced for the non- household waste materials.</p>		
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JUDGEMENT

Option 1 – Screening Sufficient - YES

Option 2 – Internal Action Required – YES – action plan prepared

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: David Beaver

Job Title: Head of Waste Management

Date:

Director

Signed:

Name: Simon Jones

Job Title: Director of Highways,
Transportation and
Waste

Date: