

Equality Impact Assessment

Provide basic details

Name of proposal/activity/policy to be assessed

Proposals for the Recycling Centres

Directorate: ~~Children, Education & Early Help Services / Adult Care & Health Services / DENS / CSS~~ (delete as appropriate)

Service: Streetcare

Name and job title of person doing the assessment

Name: Sarah Innes

Job Title: re3 Monitoring and Performance Officer

Date of assessment: 29/03/2016 (Revised 29/06/2016)

Scope your proposal

What is the aim of your policy or new service/what changes are you proposing?**1) Residency Checks**

Under residency checks all users of the Recycling Centres will be required to display a 'recycling centre resident's permit' or show another form of ID to HWRC staff in a Meet and Greet role to prove that they live within the re3 Partnership area. Non-residents (or people without ID) will not be granted access to the facilities.

2) Restrictions on Commercial Type Vehicles

In return for a valid residential address and details of the vehicle and waste to be brought to site residents wishing to access the re3 Recycling Centres in any vehicle other than a car (or with a trailer above 1.8m in length) should be issued with a permit. This system would allow each household to utilise a commercial-type vehicle or trailer to deposit household waste, subject to the Partnership's Waste Acceptance Policy. Trailers over 3m in length and box vehicles will not be eligible for the scheme. Residents will be required to apply for each of their permits individually and online and the details on the permit will be checked against the resident's ID. The re3 Councils will monitor the number the number of visits made by individual residents and/or vehicles to the Recycling Centre and we may contact residents if it appears that the number of visits suggests activity more like that of a trader than a householder.

3) Charges for Waste

Charges will be introduced at the re3 Recycling Centres to cover the costs of handling, hauling and disposing non-household wastes from householders– including hardcore, soil (from landscaping activities), asbestos, plasterboard and gas bottles. These charges will also cover some revenue and capital costs.

4) Bag Splitting

In order to divert recycling materials away from the residual waste stream, it is proposed that residual waste bags be opened and the contents sorted by HWRC staff.

Who will benefit from this proposal and how?

1) West Berkshire currently pay the re3 partnership for the use of the Smallmead facility by people resident in its area. Based on a 15% West Berkshire patronage at the HWRC, the contribution to the re3 costs in 2016/17 would have been in the region of £506,000. West Berkshire Council undertook a public consultation and notified re3 of its intention to withdraw from their financial arrangement with re3. Residency checks will help ensure that re3 residents are not required to cover the cost of waste disposal from West Berkshire when financial contributions are ceased.

2) Van permit schemes are widely used to control access to commercial-type vehicles and can limit the ability of businesses to illegally deposit trades waste at the taxpayers' expense. For every 1% of HWRC waste deposited by traders, the cost to the re3 councils is approximately £68,000. The savings that can be realised in waste management can contribute to other services such as health, education and social care.

3) The estimated cost of accepting hardcore, soil from landscaping activities, plasterboard and asbestos for free in 2016/17 is £915,000. As at (2) above, savings that can be realised in waste management can contribute to other services such as health, education and social care.

4) Failure to recycle or re-use 50% of household waste by 2020 could impact on the financial support received in the form of the PFI Revenue Support Grant. This is worth around one million pounds to each re3 Council annually.

What outcomes does the change aim to achieve and for whom?

1) The positive identification of re3 residents will ensure that residents of the Partnership are not required to cover the cost of waste disposal from West Berkshire in the event that financial arrangements are terminated. An indirect outcome may be reduced visitor numbers (leading to reduced congestion) in the Recycling Centres.

2) A permit system is designed to make it harder for traders to be able to deposit their waste at the Recycling Centres at the tax-payers expense. The removal of the height barrier and time restrictions for vehicles over 1.95m in height should increase convenience for genuine residents who utilise vehicles in excess of the current height restrictions.

3) Residents will only pay for what they need to dispose. The charges should make the Recycling Centres a less attractive disposal option for traders to try to pass their business waste off as household waste at the tax-payer's expense.

4) Recycling can have financial, social and environmental benefits. An increase in recycling rate will assist the re3 partnership in moving towards a 50% recycling rate by 2020.

Who are the main stakeholders and what do they want?

Regulators – Services need to be provided in accordance with Section 51 of the Environmental Protection Act (EPA) 1990. This states that places must be provided for persons resident within the waste disposal authority area to deposit their household waste free of charge. The Controlled Waste (England and Wales) Regulations 2012 classes “waste from construction or demolition works, including preparatory works” as Industrial waste, where ‘construction’ is defined as including improvement, repair or alteration.

Re3 residents – Many of the comments provided during the September 2015 HWRC User Satisfaction Survey in relation to future service improvements related to site layout, traffic management and queuing. Some of the other comments were classed by MEL as relating to ‘more materials’, ‘improve signage’, and ‘improve staff assistance’.

Non-re3 residents – Comments received by West Berkshire Councils in relation to their March 2016 consultation related to travel times to the nearest HWRC and associated costs to residents and impacts on the environment. Other feedback detailed in the West Berkshire Consultation Summary Report relate to increases in fly-tipping and savings not being realised.

FCC – Based on discussions with the contractor, safety (for staff and service users) is a clear priority.

Neighbours of the facilities – Based on previous contact with neighbours of the Longshot Lane facility, ease of access for staff and customers is important.

Assess whether an EqlA is Relevant

How does your proposal relate to eliminating discrimination; promoting equality of opportunity; promoting good community relations?

Do you have evidence or reason to believe that some (racial, disability, gender, sexuality, age and religious belief) groups may be affected differently than others? (Think about your monitoring information, research, national data/reports etc.)

Yes / ~~No~~ (delete as appropriate)

Is there already public concern about potentially discriminatory practices/impact or could there be? Think about your complaints, consultation, and feedback.

Yes / ~~No~~ (delete as appropriate)

If the answer is **Yes** to any of the above you need to do an Equality Impact Assessment.

If No you **MUST** complete this statement

An Equality Impact Assessment is not relevant because: N/A

Signed (completing officer): Sarah Innes

Date: 29/06/2016

Signed (Lead Officer)

Date

Assess the Impact of the Proposal

Your assessment must include:

- **Consultation**
- **Collection and Assessment of Data**
- **Judgement about whether the impact is negative or positive**

Think about who does and doesn't use the service? Is the take up representative of the community? What do different minority groups think? (You might think your policy, project or service is accessible and addressing the needs of these groups, but asking them might give you a totally different view). Does it really meet their varied needs? Are some groups less likely to get a good service?

How do your proposals relate to other services - will your proposals have knock on effects on other services elsewhere? Are there proposals being made for other services that relate to yours and could lead to a cumulative impact?

Example: A local authority takes separate decisions to limit the eligibility criteria for community care services; increase charges for respite services; scale back its accessible housing programme; and cut concessionary travel.

Each separate decision may have a significant effect on the lives of disabled residents, and the cumulative impact of these decisions may be considerable.

This combined impact would not be apparent if decisions are considered in isolation.

Consultation

How have you consulted with or do you plan to consult with relevant groups and experts. If you haven't already completed a Consultation form do it now. The checklist helps you make sure you follow good consultation practice.

[My Home > Info Pods > Community Involvement Pod - Inside Reading Borough Council](#)

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
RBC Policy Team	Meeting	24/03/2016
Internal legal advisors	Email correspondence/ meetings	April 2016

Residents were advised of the forthcoming changes via a press release in early May 2016.

Collect and Assess your Data

Using information from Census, residents survey data, service monitoring data, satisfaction or complaints, feedback, consultation, research, your knowledge and the knowledge of people in your team, staff groups etc. describe how the proposal could impact on each group. Include both positive and negative impacts.

(Please delete relevant ticks)

Describe how this proposal could impact on Racial groups

Restricting users to online methods of application may have a negative impact on racial groups where English is not their first language.

Is there a negative impact? Yes No Not sure

Describe how this proposal could impact on Gender/transgender (cover pregnancy and maternity, marriage)

Is there a negative impact? Yes No Not sure

Describe how this proposal could impact on Disability

Is there a negative impact? Yes No Not sure

Describe how this proposal could impact on Sexual orientation (cover civil partnership)

Is there a negative impact? Yes No Not sure

Describe how this proposal could impact on Age

Restricting users to online methods of application may have a negative impact on elderly groups who may be less likely to be users of technology.

Is there a negative impact? Yes No Not sure

Describe how this proposal could impact on Religious belief?

Is there a negative impact? Yes No Not sure

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you **MUST** assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

Tick which applies (Please delete relevant ticks)

1. **No negative impact identified** Go to sign off

2. **Negative impact identified but there is a justifiable reason**

You must give due regard or weight but this does not necessarily mean that the equality duty overrides other clearly conflicting statutory duties that you must comply with.

Reason

It is proposed that van permit applications only be accepted via online methods to reduce costs associated with admin and printing and posting permits.

3. **Negative impact identified or uncertain**

What action will you take to eliminate or reduce the impact? Set out your actions and timescale?

The impacts of only accepting van applications online can be minimised by ensuring that website text is available in more than one language and ensuring that residents are aware that they can access internet facilities through local libraries where staff will be available to assist if required.

How will you monitor for adverse impact in the future?

We will monitor feedback received when further details about the changes are made public and when the changes are introduced.

Signed (completing officer): Sarah Innes

Date: 29/06/2016

Signed (Lead Officer)

Date