

Equality Impact Analysis Record Form 2020 – Derbyshire County Council

Part 1: Introduction and Context		
Policy/ Service under development/ review	Household Waste Recycling Centres – Restriction of Access	
Department/ Enterprising Council Workstream	Place	
Lead officer/ Workstream Lead	Daniel Ayrton	
EIA Team:		
Date analysis commenced: November 2022	Date completed: February 2024	Date approved: 13/02/2024
<p>Aims/ objectives of the policy/ service?</p> <p>Derbyshire County Council is a Waste Disposal Authority (“WDA”) with statutory duties to arrange for the disposal of Local Authority Collected Municipal Waste (“LACMW”). Under Section.51 of the Environmental Protection Act 1990, it is the duty of all WDAs to provide places for residents in its area to deposit household waste and to arrange for its disposal.</p> <p>These Household Waste Recycling Centres (“HWRC”) must operate free of charge, be situated in a reasonably accessible location and be open at all reasonable times. The Council provides nine HWRCs across its administrative area, eight operated under contract by the waste management company HW Martin, and one operated under contract by Suez Recycling and Recovery UK Ltd.</p> <p>As part of the 2021-22 budget setting process, £230,000 recurring revenue saving was identified by introducing a set of measures to ensure only residents of Derbyshire were able to access the County’s network of HWRCs.</p> <p>The budget saving relies on the Council implementing a robust system to identify users of HWRCs who are not domicile within the County boundary or who are operating commercially in order that they be refused entry to use the HWRCs.</p>		

<p>What outcomes will be achieved with the new or changing policy/ service?</p> <p>The primary impact of the proposal will be a reduction in the cost of processing and disposing of waste.</p>	
<p>Are there any associated/ linked policies, services or procedures?</p>	<p>Derby Joint Municipal Waste Management Strategy (JMWMS) The JMWMS strategic goals are:</p> <ul style="list-style-type: none"> • To reduce the amount of waste produced, • To reuse, recycle and compost as much material as possible, and • To find the most sustainable solutions to deal with any waste produced.
<p>Please list the main people or groups that this policy/ service is designed to benefit and any other stakeholder involvement?</p>	<p>HWRCs are a universal service available without charge to any resident of Derbyshire. The service is paid for out of the general revenue account and as such any benefit from a reduction in costs cannot be traced to any one group. However, the Council has a best value duty to its residents and delivering statutory services at lower cost is in the broader public interest.</p> <p>Employees of the HWRC operator are frequently subject to abuse and in a limited number of cases threats of or actual violence against them when they seek to prevent unregistered commercial waste carriers exploiting the HWRC provision. Additional checks on vehicles entering sites may also provide additional evidence to pursue legal proceedings against individuals committing such offences.</p>
<p>Will the policy/ service and any changes impact on any other organisations such as community and voluntary sector groups?</p>	<p>No such impacts have been identified.</p>

<p>Part 2: Supporting evidence</p>
<p>Please list and/ or link to below any recent and relevant consultation and engagement that can be used to demonstrate clear understanding of those with a legitimate interest in the policy/ service and the relevant findings:</p>

A 12-week consultation took place from the 2 October 2023 seeking views from residents and businesses to proposed changes to Recycling Centres. The consultation received 2876 responses with a demographic profile of:

- 49% male and 47% female
- 83% over 45 (40% aged 45 - 64 and 43% over 65 years old)
- 12% recorded themselves as having a disability

The consultation was run primarily through the Derbyshire County Council Consultations online portal but was also available in paper format through local libraries or on request – only 4.1% of the responses were via the paper survey.

The consultation sought to understand which changes to Recycling Centres would be best received by residents and businesses, in particular, changes to opening days and times; introducing charges for tyres and asbestos; allowing trade waste to be accepted for a fee; adopting the government's definition of DIY waste; and would people have an issue registering their vehicle details online so that an ANPR system could manage access to Recycling Centres.

It is this latter question that is of most relevance to this EIA.

In response to this question, 85% of respondents said they would not have any problems registering their vehicle online. However, many people commenting highlighted issues of digital exclusion and suggested a need for alternative registration options. Namely:

- Providing proof of address or ID on arrival at a Recycling Centre
- Registering details over the phone
- By post, or in person at libraries or council offices, using a paper form

Please list or link to any relevant research, data or intelligence, Observatory or any other information that is available and will be used to help complete the analysis?

'Exploring the UK's digital divide' ONS

<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/expandingthedigitaldivide/2019-03-04>

Please list or link below to any relevant service user/ customer or employee monitoring data and what it shows in relation to any Protected Characteristic (Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race and ethnicity, Religion and belief including non-belief, Sex or gender, Sexual orientation)

Derbyshire Observatory – Derbyshire Equality Profile 2019

https://observatory.derbyshire.gov.uk/wp-content/uploads/reports/infographics/people_and_place/i_pp_equalities.pdf

If there is insufficient information please outline any plans to remedy this?

A 12-week consultation exercise has been completed to better understand potential barriers and/or adverse impacts.

Part 3 – Analysing and assessing the impact by equality protected characteristic/ group

Use the information, customer feedback and other evidence to determine upon whom the policy/ service and any proposed changes will impact upon and how, highlighting where these are negative or positive, including where this could constitute unfair treatment, additional inequality or disadvantage or result in hardship and exclusion.

Against any identified negative potential impacts you must provide details of any action or options which could mitigate against this, and in serious cases, you should highlight where the Council would be advised not to proceed with a new or changing policy or service, including any proposals which are being considered.

Please use your action plan attached to this analysis to record the action and the monitoring which will take place to deliver such mitigation.

If there is insufficient consultation or engagement information please explain what action is being taken to obtain this information and when this consultation/ engagement will be completed and available:

<i>Protected Characteristic or Group</i>	<i>Actual or potential positive outcome/ impact</i>	<i>Actual or potential negative outcome/ impact</i>
1. Age	None anticipated	Nationally, adults aged 75 years and older are significantly less likely to be regular internet users and a digital only process for registration would be likely to disadvantage this group.
2. Disability	None anticipated	Nationally, disabled adults are slightly less likely to be regular internet users and a digital only process for registration may disadvantage. Additionally, adults with learning impairments or visual impairments may require additional support to ensure equality of access.
3. Gender re-assignment	None anticipated	None anticipated
4. Marriage & civil partnership ⁱ	None anticipated	None anticipated
5. Pregnancy & maternity	None anticipated	None anticipated
6. Race & ethnicity	None anticipated	The introduction of a registration process without mitigating measures being taken may create an additional barrier for residents whose first language is not English.

ⁱ Under EA 2010 – someone in a CP must not be treated less favourably than a married person

7. Religion/ belief ⁱⁱ	None anticipated	None anticipated
8. Sex or gender ⁱⁱⁱ	None anticipated	Nationally, women have consistently represented more than half of the UKs internet non-users. A digital only process for registration would be likely to disadvantage this group.
9. Sexual orientation	None anticipated	None anticipated
10. Human Rights	None anticipated	None anticipated
11. Thriving Communities	None anticipated	None anticipated
12. Rural communities	None anticipated	Internet coverage and availability is less in rural communities than in urban or semi-urban areas. A digital only process for registration would be likely to disadvantage this group.
13. DCC Employees	None anticipated	None anticipated
14. Community and Voluntary sector organisations working with protected characteristic groups	None anticipated	None anticipated
15. Other not listed above	None anticipated	None anticipated

Key findings and likely impacts

This EIA has identified the potential for adverse impacts affecting groups with the following protected characteristics:

ⁱⁱ Under EA 2010 – must also consider non-religious belief

ⁱⁱⁱ Sex and gender can be used at different times depending upon whether you are referring to the EA 2010 and the different duties which exist

- Age
- Disability
- Race & Ethnicity
- Sex or Gender
- Rural Communities

The adverse impacts identified relate primarily to digital inclusion and the additional barriers these groups may face if the County were to introduce a digital only process. Additional communication barriers may also impact residents whose first (or only) language is not English, or residents with sensory impairments.

Mitigations have been identified in particular, the provision of alternative non-digital registration processes. The feedback of residents from the consultation has provided valuable insight into the practical considerations relevant to the design and roll out of any registration process. Detailed mitigation proposals for the concerns raised will be produced as part of developing the registration process, including making appropriate arrangements for alternatives to online registration.

Part 4 – Equality Impact Action Plan

Please complete this Action Plan for any negative or unknown impacts identified in the Analysis above.

Issue identified	Action required to reduce impact/ mitigate	Timescale and responsibility	Monitoring and review arrangements
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Internet Access / Computer literacy.	An alternative process for registering vehicles is to be developed. It is proposed that residents will be able to call Derbyshire County Council at which a call handling will be able to complete the registration process over the phone.	Telephone process to be established as part of the Granicus process build. Responsible Officer: Daniel Ayrton Timescales: Q1-Q2 2024/25	Usage statistics for the different channels will be maintained.
Language barriers.	Corporate guidelines on making web-based material accessible for residents in a range of languages.	Responsible Officer: Daniel Ayrton Timescales: Q1-Q2 2024/25	Usage statistics for the different channels and languages will be maintained.
Support for sensory impairments.	Corporate guidelines on making web-based material accessible for residents with a range of sensory impairments will be followed.	Web design to be developed as part of the Granicus process build. Responsible Officer: Daniel Ayrton Timescales: Q1-Q2 2024/25	Usage statistics for the different channels will be maintained.

Date of any Cabinet/ Cabinet Member or Council Report to which this was attached:

Outcome from consideration by Elected Members:
Draft attached to Cabinet Report – Operation and Management of Household Waste Recycling Centres – 27 July 2023.
Updated final version attached to Cabinet Report – Operation and Management of Household Waste Recycling Centres – 14 March 2024.

CONTROLLED