

Equality Impact Assessment Form **Reference – R41**

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| **Department** | Place – Waste Services | **Version no** |  |
| **Assessed by** | Richard Galthen | **Date created** | 06/12/22 |
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The Equality Act 2010 requires the Council to have due regard to the need to

* eliminate unlawful discrimination, harassment and victimisation;
* advance equality of opportunity between different groups; and
* foster good relations between different groups

# Section 1: What is being assessed?

**1.1 Name of proposal to be assessed.**

Waste Review (R41) ​

**1.2 Describe the proposal under assessment and what change it would result in if implemented.**

Full closure of Keighley (Royd Ings) HWRC and Saturday closures of all HWRCs in order to reduce casual overtime expenditure and ease staffing issues. 24 operatives are required daily to keep the sites open, sickness, holidays and recruitment place a constant strain on this resource.

Implementation of the proposal would result in a reduction of casual overtime, circa £0.3m per year and less strain on staff to cover eight sites, 7 days per week.

# Section 2: What the impact of the proposal is likely to be

* 1. **Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.**

N/A – We have eight HWRCs across the district. This proposal will result in having one less HWRC with alternative sites being up to a 20-minute drive.

* 1. **Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.**

N/A

* 1. **Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.**

Implementation of proposal would impact all residents who currently use the site, and in particular, the ones close to Keighley HWRC. Approx. 281 visitors per day to the site, however this includes repeat visitors.

Only car users can access the HWRCs and there are alternate HWRCs a short distance away.

There may be a low disproportionate negative impact on those people who are disabled and those people who are on a low wage/income due to need to travel by car to other sites that may not be as close as this site to where they live.

**2.4 Please indicate the level of negative impact on each of the protected characteristics?**

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

|  |  |
| --- | --- |
| **Protected Characteristics:** | **Impact**(H, M, L, N) |
| Age | N |
| Disability | L |
| Gender reassignment | N |
| Race | N |
| Religion/Belief | N |
| Pregnancy and maternity | N |
| Sexual Orientation | N |
| Sex | N |
| Marriage and civil partnership | N |
| **Additional Consideration:** |  |
| Low income/low wage | L |

**2.5 How could the disproportionate negative impacts be mitigated or eliminated?**

(Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

Proximity of other alternative sites is expected to alleviate any potential low negative disproportionate impacts on those who are disabled or on low income. Data on site visits will continue to be used to inform service development.

# Section 3: Dependencies from other proposals

* 1. **Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.**

None, HWRCs are utilised by residents only

# Section 4: What evidence you have used?

**4.1 What evidence do you hold to back up this assessment?**

The number of HWRC visits (noted manually) shows that on average:

* Monday to Friday – 346 visits per day (Royd Ings HWRC is 281)
* Saturday – 359 visits (Royd Ings HWRC is 189 due to closing at 12pm)
* Sunday – 440 visits
* Approx. 21 percent increase in visits on a Sunday (94 extra visits) compared to weekdays.

Royd Ings HWRC is one of the least used HWRCs and also has opening time restrictions due to planning permission.

In particular, Royd Ings and Ford Hill HWRCs are known to be inefficient due to the small area available and use of electric compaction skips, which only have 50 percent capacity of standard skips and therefore cause significant downtime on the sites.

Royd Ings HWRC accounts for around 13 percent (6,276 tonnes) of waste per year and this requires around 314 vehicle movements as a mimimum to transport to Bradford Transfer Station for onward disposal.

Sugden End HWRC and Dowley Gap HWRC would be able to cope with increased tonnage and visits. Royd Ings HWRC is too small and due to the compaction skips and planning restrictions, would not be suitable for increased tonnage or visits.

**4.2 Do you need further evidence?**

Yes – continuous monitoring of data including visits, tonnages etc. Costs for maintaining and replacing compaction skips is increasing so this needs to be investigated as does basic upkeep of the site.

# Section 5: Consultation Feedback

**5.1 Results from any previous consultations prior to the proposal development.**

n/a

**5.2 The departmental feedback you provided on the previous consultation (as at 5.1).**

n/a

**5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).**

Those commenting on the aspect of the proposal concerning potentially closing the Keighley Household Waste and Recycling Centre were concerned that there would be a disproportionate impact on the following groups if this aspect of the proposal was implemented:

* Older people – they cited that a large number of older people live in the area the site serves –
* Disabled people –
	+ the site provides easier access for those with mobility issues than alternative sites
	+ Disposal of personal hygiene waste - Impact on people who are incontinent as provides close and accessible site for disposal of personal soiled waste, such as adult diapers
* Parents/carers – as using alternative sites would increase the amount of time required to dispose of waste
* Low income - as would need to pay more for fuel to travel to other sites

**5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.**

Each site can be used by any age group and we do not hold any data on how many of each group use a specific site. There is no data to suggest a negative impact on any age group.

All sites are to be accessed via vehicles and have dedicated parking areas next to or near the skips therefore, othe sites will be accessible to people with disabilities.

Personal hygiene waste should go in domestic bins. Any volumes that cannot fit in a domestic bin can be taken to any HWRC.

Data shows Keighley HWRC has the lowest number of properties surrounding it compared to the other Bradford/Keighley HWRCs.

In line with Executive’s decision of the 6 January 2023, Waste Services are considering options which could negate the need to close the Keighley HWRC and will further appraise Council Executive prior to their meeting on the 21 February 2023 where Executive will be deciding their final budget recommendations to Budget Council on the 23 February 2023.