



**Cabinet 26 June 2018**

**Appendix 2**

**HWRS Service Review**

**Equality Impact Assessment**



# Equality Impact Assessment

## Project or Service Template

Name of the proposal, project or service
<b>Household Waste Recycling Site (HWRS) Service Proposals</b>

File ref:		Issue No:	01
Date of Issue:	June 2018	Review date:	12 months following implementation of any changes to the HWRS Service

### Contents

Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)	1
Part 2 – Aims and implementation of the proposal, project or service	4
Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics	10
Part 4 – Assessment of impact	166
Part 5 – Conclusions and recommendations for decision makers	466
Part 6 – Equality impact assessment action plan	48

## **Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)**

**1.1** The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

**1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.**

### **1.3 The Public Sector Equality Duty (PSED)**

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (see below for “protected characteristics”

These are sometimes called equality aims.

### **1.4 A “protected characteristic” is defined in the Act as:**

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

### **1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:**

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21st Century Families and Communities, 2008]
- Literacy/Numeracy Skills

- Part time workers
- Rurality

## **1.6 Advancing equality (the second of the equality aims) involves:**

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

## **1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:**

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 *Some key points to note :*

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.
- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

## Part 2 – Aims and implementation of the proposal, project or service

### 2.1 What is being assessed?

#### a) Proposal or name of the project or service.

Our Household Waste Recycling Site (HWRS) Service proposals:

- Proposal 1: Charge for certain non-household wastes at our sites  
I.e. rubble, soil, plasterboard, tyres and asbestos.
- Proposal 2: Permanently close the sites at Wadhurst and Forest Row  
We propose to permanently close these two smaller, part-time HWRSs.
- Proposal 3: Change opening hours at certain HWRSs to better suit demand  
This could mean sites closing at quieter times when there's less demand and some sites opening for longer at the busier time of weekends.  
Most of our recycling sites open from 8 or 9am until 4 or 5pm every day. We propose the sites could open for slightly shorter days, remaining open during the peak time of 9am to 4pm.  
The sites at Crowborough and Eastbourne close in the afternoon on Saturdays and Sundays. We are proposing to open these sites all day at weekends and close them during less busy hours or days in the week.
- Proposal 4: to make improvements to the layout of Hailsham recycling site.  
It is proposed to extend Hailsham HWRS and improve the site layout to create space for additional containers which will allow greater separation of materials for recycling and recovery to help generate ongoing savings through increased diversion from landfill.

#### b) What is the main purpose or aims of proposal, project or service?

The main purpose of the proposals is to make a saving of approximately £720,000 a year from the cost of our waste disposal contract.

The County Council's funding from central government continues to reduce and due to these cuts, caps placed on increasing council tax and the rise in demand for Council services, our budget can no-longer cover the current costs.

In the meantime, we must continue to provide residents with a safe and reasonably accessible Household Waste Recycling Site service, and we are also proposing some improvements to help us run the service more efficiently and be responsive to customer demand.

It costs £2.5m to pay for the upgrades to and the operation and management of our HWRSs, and £7.5m to recycle and dispose of the waste that our residents bring to them. At the Full Council meeting on 6 February 2018, the Council's annual budget was considered and it was decided to reduce the annual waste and recycling budget by £720,000, of which sum, savings of £558,000 will need to be made in 2018/19.

### Aims of the proposals

- To make savings whilst running efficient sites which recycle as much as possible and are reasonably accessible for residents.
- Maintain a network of HWRS with opening hours that meet the needs of residents and also make operational and economic sense
- Improve the layout of Hailsham HWRS, thereby improving performance and user experience.
- To continue to meet our statutory obligations under the Environmental Protection Act 1990.

### **Manager(s) and section or service responsible for completing the assessment**

Sarah Watson, Project Officer within the Waste Team, Transport and Operational Services in Communities, Economy & Transport has completed this assessment. Sarah worked on the last HWRS review in 2013 and has extensive experience with complex waste projects, performance management, consultations and complex data analysis. Sarah also worked on the previous Joint Waste Strategy EqIA relating to the 2013 HWRS review.

## **2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?**

The HWRSs provide a network of sites available to all East Sussex residents for the free disposal of household waste, including bulky items and a wide range of materials for recycling. HWRS are especially useful for waste which cannot be recycled or disposed of via the Borough and District Council collection services or the bring banks at the smaller recycling points operated by the Borough and District Councils.

### **Who is affected?**

This proposal has the potential to affect all current site customers and future users of the HWRS Service, although those most likely to be affected differ with each proposal:

- **Proposal 1:** Charging for non-household waste – charges will mainly affect those site-users with waste created from work on properties or gardens, and vehicle owners with tyres to dispose of.
- **Proposal 2:** HWRS Closures – will affect residents who currently use the Forest Row and Wadhurst sites, and those in the catchment area who may want to use them. There could also be an impact on staff if fewer personnel are required.
- **Proposal 3:** Adjusting opening times – will affect site-users that use, or want to use the sites at the times we may make changes. We are working with Veolia to understand what effect this could have on their staffing patterns, recruitment, retention, etc.
- **Proposal 4:** Improve Hailsham HWRS - Hailsham site-users and staff, as well as future users.

### **Who is it intended to benefit and how?**

- **Proposal 3:** Adjusting opening times – weekend opening of the Eastbourne and Crowborough sites will benefit some residents, especially residents who work and use these sites, who might find it easier to visit at weekends.
- **Proposal 4:** Improve Hailsham HWRS – the site layout will be improved with more space for pedestrians and cars. This would result in benefits to Hailsham site customers, allowing more space to park and to use the site, helping them to feel safer, and giving them the opportunity to recycle more materials. It would also provide an

improved site for staff to work within, i.e. more space and easier servicing. The site extension will also provide greater capacity to meet the increased customer demand arising from future housing growth planned for Hailsham and surrounding area.

### **2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?**

East Sussex County Council acts as the Waste Disposal Authority (WDA), providing the Household Waste Recycling Sites. The HWRS Service proposals have arisen from the Service Review and have been agreed by the Project Board and Department Management Team and will be considered by Chief Officers and by Cabinet in June 2018.

The Project Board for this project comprises Karl Taylor, Assistant Director Operations, Communities, Economy & Transport; Carl Valentine, Head of Service for Transport and Operational Services; and Warwick Smith, Head of Communications, Governance Services.

Implementation of the proposals will be overseen by the Assistant Director Operations, Communities, Economy and Transport; the Head of Service for Transport and Operational Services and the Waste Team Manager. Relevant updates will be provided on progress to Scrutiny Committee, Lead Member or Cabinet as required.

Veolia Southdowns is contracted by the County Council to manage the HWRS service and will be expected to implement any operational changes at the sites, while the County Council's Waste Team staff will monitor these and provide the majority of the publicity to let residents know what changes are being made. Other Council departments and community partners will be important, such as Communications, and levels of local Government, such as the District and Borough Councils that deal with waste collections, and the Town and Parish Councils, will assist us to publicise changes.

### **2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?**

In April 2003 a 25-year Integrated Waste Management Services Contract (IWMSC) for the disposal of household waste worth approximately £1 billion was awarded to Onyx South Downs Ltd – now known as Veolia South Downs Ltd – by East Sussex County Council and Brighton & Hove City Council. A five year extension was agreed in 2008 and the contract will now end in March 2033. The contract includes the responsibility for managing the HWRSs in the contract area, of which East Sussex County Council currently provides twelve.

Internal stakeholders have been engaged during the development of the proposals. We have notified and encouraged other key external stakeholders to comment, including the District and Boroughs who are responsible for household waste collection, neighbouring Councils, the Town and Parish Councils within East Sussex and others, such as East Sussex Fire & Rescue Service, Sussex Police and community or voluntary sector support organisations and forums for the elderly and disabled (for a list of those contacted, see the Public Consultation Analysis report, Appendix 1 of the Cabinet report).

## **2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?**

Our proposals focus more on our statutory obligations than before, setting out our approach to continue to provide an effective, efficient, affordable and sustainable HWRS service for the future.

The Council must follow Waste Regulations and the Waste Hierarchy, taking all such measures as are reasonable in the circumstances to prevent waste and apply the waste hierarchy in handling household waste.

The County Council, as a WDA is required by the Environmental Protection Act 1990, section 51, to provide sites for residents to dispose of their household waste, free-of-charge. There is no specified minimum required number of sites or mandatory opening times, although they must be open at 'reasonable times' and for part of either Saturday or Sunday and must be 'reasonably accessible'. There is no obligation to accept waste free-of-charge other than that classified as 'household waste'.

Defra are expected to provide updated guidance on charging for non-household waste in May 2018. Officers at this time have no reason to believe that this guidance will affect proposals, but will monitor and react accordingly when it is issued.

This service was subject to a service review in 2013 and more recently in 2017. In 2014 we revised our joint strategy for managing the county's waste until 2025 with our Waste Collection Authority partners. The County Council also has to plan for the long-term management of waste. The Waste and Minerals Plan for East Sussex, South Downs and Brighton and Hove covers local authority collected waste, as well as waste from commercial and industrial premises and from construction, demolition and excavation works. The plan's approach is to reduce the amount of waste created and to make sure that there is enough capacity in the future to deal with increases in recycling and recovery of waste.

## **2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.**

The service provides a network of HWRSs available to all East Sussex residents for the free disposal of household waste free-of-charge, and certain non-household wastes within a monthly limit. All members of the public bringing household waste to the site may use the sites during opening hours, provided there are no temporary site closures e.g. because of weather conditions, emergencies or maintenance work.

The sites are signposted from the main roads and promoted on the East Sussex County Council website rubbish and recycling website pages, and Veolia's website on their recycling site website pages:

[www.eastsussex.gov.uk/environment/rubbishandrecycling/recyclingsites/wastesites](http://www.eastsussex.gov.uk/environment/rubbishandrecycling/recyclingsites/wastesites)  
[www.veolia.co.uk/southdowns/recycling-sites](http://www.veolia.co.uk/southdowns/recycling-sites)

In terms of the 2018 consultation on our proposals, we explained that if people needed the consultation survey in another format e.g. a paper copy, they could request one by telephone or email. People were encouraged to let us know if they needed more help to take part in the survey.

3,336 respondents completed the questionnaire online and 49 completed a paper version of the questionnaire.

In developing the survey questions, overview and FAQs accompanying the consultation, the Plain English Campaign's 'Drive! Defence' tool, as well as a 'readability' tool were used to help ensure the text was clear, easy to understand and accessible.

One person called us and said they didn't want to complete the survey or write to us, so we took their points of view over the telephone and included them in our comments analysis. People and organisations also wrote to us and emailed us with their views, which we logged and analysed. We also met directly with various organisations to discuss the proposals and their views: Forest Row and Wadhurst Parish Councils, Horam Parish Council AGM, the East Sussex Joint Waste Collection Partnership, and West Sussex County Council.

**2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.**

There is no referral method.

**2.8 How, when and where is your proposal, project or service provided? Please explain fully.**

Household Waste Recycling Site network



**Map 1: Locations of 12 current Household Waste Recycling Sites**

Transport accessibility mapping showed 98.4% of residents (around 518,250 people) can reach an HWRS within 20 minutes by car or similar vehicle.

There is information on both Veolia's website and the Council's to publicise that assistance is available on request at the sites to residents with disabilities who need help for taking items to the correct recycling containers, as well as information on the availability of disabled parking:

[www.veolia.co.uk/southdowns/recycling-sites](http://www.veolia.co.uk/southdowns/recycling-sites)

[www.eastsussex.gov.uk/environment/rubbishandrecycling/recyclingsites/permits](http://www.eastsussex.gov.uk/environment/rubbishandrecycling/recyclingsites/permits)

There is a hatched, wider parking space for disabled site-users at all of the sites except Forest Row and Hailsham (which are more challenged in terms of available space). These parking spaces are located for the convenience for the user or in visible areas for the staff so that they can give assistance. At all but two of the sites (Crowborough and Heathfield) there are drop kerbs or no kerbs at all.

### HWRS opening hours

The Forest Row, Wadhurst and Seaford sites currently open three days a week. The other sites are normally open seven days a week from 8 or 9am, until 4pm or 5pm, and some until 6pm in summer. Except Eastbourne HWRS that closes at 3.30pm on Fridays and 12 noon at weekends, and the Crowborough and Hailsham sites both close at 1pm at weekends. Most of the sites are open normal hours on bank holidays, except Crowborough and Eastbourne which are closed, and Hailsham which closes at 1pm.

### Non-household waste policy

At present, we don't charge residents to bring waste to our sites, but we do have monthly limits on the amount of some materials classed as 'non-household' waste, i.e. rubble, soil, plasterboard, tyres and asbestos brought in. Legally, the County Council only has to accept and pay for materials classified as 'household' waste that residents bring to the sites.

### Hailsham HWRS

Hailsham is an older site operating within a relatively small area. This makes use awkward for residents, with only one small area for the public to park their cars and access the containers, and it also limits recycling options.

## Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.

### 3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.

Types of evidence identified as relevant have <b>X</b> marked against them			
	Employee Monitoring Data		Staff Surveys
<b>X</b>	Service User Data	<b>X</b>	Contract/Supplier Monitoring Data
<b>x</b>	Recent Local Consultations		Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector
	Complaints		Risk Assessments
<b>x</b>	Service User Surveys		Research Findings
<b>x</b>	Census Data	<b>X</b>	East Sussex Demographics
<b>x</b>	Previous Equality Impact Assessments	<b>X</b>	National Reports
	Other organisations Equality Impact Assessments	<b>X</b>	Any other evidence, e.g. our HWRS Service Reviews, traffic logs, waste tonnage data, site performance, journey route mapping.

#### 3.1.1 Evidence of complaints against the proposal, project or service on grounds of discrimination.

We had no direct complaints about discrimination prior to the consultation regarding our HWRS service. Veolia produce an annual service report which includes complaints analysis, and as far as we are aware, there are no specific complaints that relate to discrimination.

During the 2018 consultation, 99 (out of 8,149) or some 1% of total comments from survey respondents and one comment via letter said that it would cost too much to travel to other sites, particularly with regard to the site closure proposals (91% of those comments). In addition there were 215 comments (2-3% of comments overall) from respondents' with concerns about difficulties accessing the other sites or without cars, particularly with regard to the site closure proposals (91% of those comments).

There were 91 comments from survey respondents that the current or proposed opening times are inconvenient for those who work, and most of these (92%) referred to the proposal to change site opening times. We received 81 comments from survey respondents and 2 via letters that the elderly would be disadvantaged by the proposals. Most of these (72% of those comments) referred to the proposal to close the sites.

There were also 34 comments from survey respondents that those on low incomes would be disadvantaged by the proposals, particularly with regard to the proposal to charge for non-household waste (62%). Plus 13 comments from survey respondents that the disabled would be disadvantaged by the proposals, which were mainly (92%) regarding proposals 1 and 2 about charging for certain wastes and site closures. In addition there were 11 comments about an unwelcome loss of employment, and this was mainly (55%) with reference to proposal 2 about site closures.

During the consultation some survey respondents (56 people) also raised issues with the fairness of the ranking question 14, (for the survey questionnaire, see the Consultation report, Appendix 1 of the Cabinet report). Some felt that by making this a required question, they were being forced to rank options that they didn't agree with, and felt it was discriminatory. The intention was to gather and present an overall picture of people's views in terms of the specific proposals, but we do appreciate that people may not find any of the proposals acceptable.

We have referred to these concerns in the Consultation report, and the responses to that question have not been considered in isolation, but in combination with the responses to each individual proposal. As a result, we have specified in our report that this question is for information rather than evidence to attach much significance to.

Through the consultation survey, we asked questions about the acceptability of each individual proposal and also gave residents an opportunity to present any specific concerns or comments in free text boxes. Comments in the text boxes within the survey responses were analysed and if a respondent commented that they found the 'preferred options' question unacceptable and asked that we did not include their answer to that question, we did not count it.

### **3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.**

To inform the proposals for Cabinet being consulted on, a thorough review of the Household Waste Site service was undertaken in 2017.

The full review was published on our website alongside and FAQs and a 12-week public consultation on the HWRS proposals which was undertaken from 22 February until 15 May 2018:

- Consultation Hub overview: [consultation.eastsussex.gov.uk/economy-transport-environment/household-waste-recycling-sites-have-your-say-1/](https://consultation.eastsussex.gov.uk/economy-transport-environment/household-waste-recycling-sites-have-your-say-1/)
- HWRS Review: [www.eastsussex.gov.uk/media/10071/hwrs-service-review-final-2017-200218.pdf](http://www.eastsussex.gov.uk/media/10071/hwrs-service-review-final-2017-200218.pdf)
- FAQs: [www.eastsussex.gov.uk/environment/rubbishandrecycling/proposals-for-the-household-waste-recycling-sites-frequently-asked-questions](http://www.eastsussex.gov.uk/environment/rubbishandrecycling/proposals-for-the-household-waste-recycling-sites-frequently-asked-questions)

East Sussex residents were invited to have their say on the proposed changes by completing a consultation questionnaire. We received 3,385 online and written responses to the consultation questionnaire which is 0.7% of the East Sussex population aged 16 and over (454,109 people, source: ONS Population Estimates, 2017).

People also emailed the Council's Waste team directly or wrote in with their comments, and 36 representations via email and letter (and one phone call) were received after the start of consultation from members of the public, organisations and MPs. Twelve Parish Councils, a District Council and a neighbouring County Council also sent in representations (for a list of those sending in representations, see the Consultation report, Appendix 1 of the Cabinet report). There were also four petitions received against site closure, totalling 7,035 signatures. These petitions have been considered alongside the results of the public consultation.

We also received two petitions a week before the official start of the consultation against the closure of the Forest Row site with around 4,200 signatures, and two further petitions against the closure of the Wadhurst site totalling an additional 2,835 signatures during the consultation period. Petition signatures totalled 7,035.

Efforts were made to promote the questionnaire to non-users, as well as users, of the service. Nevertheless, the vast majority of respondents to the consultation questionnaire (99%) were HWRS-users.

To encourage people to take part, we publicised the consultation with banners, posters and leaflets at each of the HWRSs, as well as posters and leaflets at libraries and other council sites. At the start of the consultation, our press release was picked up by the Sussex Express, Eastbourne Herald, Hastings Observer and BBC Sussex Drivetime.

Regular posts were published on our Twitter and Facebook accounts, and there were links to the online consultation from the 'Rubbish and recycling' pages on our website as well as from the East Sussex County Council home page.

Various stakeholders were emailed directly to notify them of the consultation, including the County, District and Borough Councillors, Town and Parish Councils, and a variety of relevant local voluntary and public sector organisations including support organisations and forums for the elderly and the disabled (see the Consultation report, Appendix 1 of the Cabinet report).

Efforts were made in terms of those with protected characteristics by making the consultation questionnaire available upon request in other formats, including printed paper copies.

The consultation questionnaire included "About You" questions so that we could understand more about who is using our services and to consider any negative impacts of our proposals on protected groups, how impacts might be addressed and how to better advance equality. Also to identify any gaps in those groups engaged.

### **3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service?**

#### HWRS consultation

The consultation shows that people believe there would be some negative impacts on particular groups as a result of the proposed service changes. For the full consultation questionnaire and analysis of responses, see the Consultation report, Appendix 1 to the Cabinet report.

In response to question 13 about the overall proposals as a way to make savings in the consultation questionnaire, 1,530 consultation respondents or 45%, found the proposed changes acceptable (30%) or neutral (15%) regarding the overall focus of our proposals.

A significant number of the comments indicated respondents' support for several of the proposals. However, some of the comments also evidence that people are concerned about disadvantaging the elderly, working people, those without transport or with difficulty accessing alternative sites, those on low incomes, site staff in terms of their employment and working hours, and the disabled.

- **Proposal 1:** Charge for certain non-household wastes at our sites.  
57% (1,920 people) broadly accept the proposal to charge for non-household waste.
- **Proposal 2:** Closure of Wadhurst and Forest Row sites.  
There is most opposition to the site closure proposals, and 55% (1,846 people) disagree that if we closed Forest Row and Wadhurst recycling sites, the remaining ten sites across the county would give residents reasonable access to the service.

Although 99% of respondents were site users (3,356 people), almost half of those predominantly use the part-time Forest Row or Wadhurst sites. Their responses to the consultation are likely to reflect the negative impact that the proposed closure of sites may have on people within these communities, and comments show that for some people it has affected their likelihood to accept the other proposals in the hope that that might prevent site closures.

Some 48% of the survey respondents (1,612 people) identified either Forest Row or Wadhurst as the site they use most often. Only 2% of responses, which is 29 people out of those that predominantly use one of these sites (1,612 people), were in broad agreement that the closure proposals would provide a reasonably accessible network of sites. This is compared to 45% of responses (801 out of 1,772 people) from those respondents that don't use one of the sites proposed for closure as their main site.

- **Proposal 3:** Change opening hours at certain sites to better suit demand. 70% (2,362 people) broadly accept the proposal to reduce opening hours at the sites overall. And 52% (1,774 people) (which is 82% of those respondents who use the Eastbourne and Crowborough sites most often) generally accept the proposal to extend weekend opening hours at those sites and reduce opening hours during quieter times.

### Previous Equality Impact Assessment

During the ESCC previous waste strategy consultation in 2013, where the closure of Forest Row, Seaford and Wadhurst sites were proposed, we received 794 replies to the waste strategy consultation questionnaire. The closure proposals generated a large separate response; the County Council received 209 written responses during the consultation period whereby people were mainly opposed to the closure of the HWRs, and a total of 13,496 petition signatures against the proposed site closures.

The comments evidenced that provision of a network of neighbourhood recycling sites and local HWRs is seen by some residents as important in terms of the provision of accessible services for the elderly.

This gave us an indication of the strong local demand for these services and at that time we adapted the proposals to keep the sites open for part of the week, and so to partially reduce the hours of operation rather than permanently close the sites.

### Service-user surveys and data

In general we undertake a regular HWRs Customer Satisfaction Survey of a random sample of East Sussex and Brighton and Hove residents by telephone, every two years. The East Sussex Customer Satisfaction Survey data we refer to in this document are derived from the survey undertaken by Veolia on our behalf in 2016, of which 719 survey respondents used our East Sussex HWRs. We do not regularly collect data about our site customers at the sites themselves, but our traffic log records show numbers of visits to each site.

Of 195 East Sussex and Brighton and Hove residents surveyed by Veolia in our 2016 customer satisfaction survey that don't use the HWRs, 4% gave the reason as due to being disabled. So we know that some people don't use the sites for that reason, however assistance is provided at the sites for disabled people that need help. We also know that the under-34s and some of our more elderly residents particularly may not be as likely to use the service as other age groups.

According to our satisfaction survey, the vast majority of people surveyed, over 99%, take their waste to the sites by vehicle, i.e. car, van, pick-up truck or motorbike, so it is mainly vehicle-users that will be impacted by the proposals, rather than those without transport.

One of the survey questions is intended to find out how older and less able people deal with a lack of accessibility to the sites, e.g. whether they use informal arrangements with neighbours, friends or family or if they pay for private collection. The latest survey shows that 9% of site-user respondents said they needed help for their waste to be taken to their local HWRS, of which 73% make informal arrangements with family, friends or neighbours.

- **Proposal 1:** Charge for certain non-household wastes at our sites  
As we currently do not charge for any wastes at the HWRSs, or ask questions in the satisfaction survey specifically about non-household wastes, or people's means to pay charges, there is no relevant service-user information available for this proposal.
- **Proposal 2:** Closure of Wadhurst and Forest Row sites.  
Our annualised visitor numbers indicate that 5% of site visits overall are to the two sites proposed for closure.
- **Proposal 3:** Change opening hours at certain sites to better suit demand.  
Annualised visitor numbers indicate that 19% of site visits overall are to the Crowborough and Eastbourne sites and these visitors could therefore benefit from the extended weekend opening hours.
- **Proposal 4:** Improve the Hailsham site.  
Annualised visitor numbers indicate that 6% of visits to the sites overall are to Hailsham, and these users could therefore benefit from the proposed improvements. Our satisfaction survey also found that fewer users were positive about Hailsham HWRS than any other site, except Seaford. The satisfaction with the range of materials that can be recycled at Hailsham was 49% compared with 59% on average across all HWRSs. Also, the feeling of safety at the Hailsham site was 7% lower than the average.

#### East Sussex demographics/census data

We identified three main characteristics: age, disability and rurality as being most likely to be affected by the proposals, rather than religion, gender, sexuality, marital status, pregnancy, literacy/numeracy, etc. These three characteristics were also raised by survey respondents during this and the last consultation, along with low income and lack of transport.

Those aged 75 and over are less likely to be able to travel to an alternative site, as are those with certain disabilities.

Rurality is not a protected characteristic under the Equality Act 2010 but is an additional factor that the County Council takes into account. For people living in rural communities the likely impact is that they would have further to travel to an alternative site.

#### HWRS Review information, 2017

- **Proposal 1:** Charge for certain non-household wastes at our sites  
Many councils already charge for some or all of the non-household waste types that we are proposing to charge for, including nearby authorities in Surrey and Hampshire.
- **Proposal 2:** Closure of Wadhurst and Forest Row sites  
Our latest review found that compared to similar English councils with similar population sizes and geographical areas, we offer an above average number of recycling sites in East Sussex. The data shows that Wealden District, particularly in the North, currently offers a lower number of residents per site than the rest of the county.

Transport accessibility mapping was also been undertaken to determine provision of local access within 20 minutes. WRAP<sup>1</sup> recognise that there is no nationally recognised steer on the acceptable level of HWRS provision and continue to cite the National Assessment of Civic Amenity Sites (NACAS)<sup>2</sup> recommendations for minimum levels of HWRS provision. These recommendations are based on journey times, catchment areas, waste tonnage throughout at sites and households/population per HWRS. The recommendation is '*maximum driving times to a site for the great majority of residents of 20 minutes in urban areas, and 30 minutes in rural areas*'.

Other nearby sites within the network including Maresfield, Crowborough, Heathfield and Mountfield would be able to receive the additional visitors and waste from Forest Row and Wadhurst. If the Household Waste Recycling Sites at Forest Row and Wadhurst closed, 98.2% (some 517,500 people) of East Sussex residents would still be able to reach an alternative site within a 20 minute drive of their home.

Our analysis of journey times showed that few site-users within the catchment area of the Forest Row site would need to travel more than an extra 10 minutes each way to reach an alternative site. Route mapping showed that for most users, it would take less than 10 minutes each way to reach an alternative site. We appreciate that reducing the number of sites may mean a longer journey for some residents to their next nearest site. However we think our proposals will ensure there are enough sites over the county within reasonable reach of residents.

- **Proposal 3:** Change opening hours at certain sites to better suit demand  
Most of our recycling sites open from 8 or 9am until 4 or 5pm every day. The sites are less busy at the beginning and end of the day, and around 90% of our customers visit the recycling sites between 9am and 4pm. We're proposing the sites could open for slightly shorter days, remaining open during the peak time of 9am to 4pm.

The sites at Crowborough and Eastbourne close in the afternoon on Saturdays and Sundays. Weekends are the busiest time for the sites. So we think opening these sites all day at weekends and closing them during less busy hours or days in the week, would be more convenient for residents.

- **Proposal 4:** Improve the Hailsham site  
There are currently limited recycling options at the Hailsham site, resulting in the poorest recycling rate of all our sites and the highest amount of material going to landfill. It is anticipated that the extension of the Hailsham site will provide space for additional containers. These could be used for a variety of different materials and it is envisaged that they will be used for cardboard, MDF, black bag and bulky waste.

Along with offering residents more opportunities to recycle, the extra containers will increase the overall capacity of the site and enable it to cope better with increased demand arising from the new housing developments in the Hailsham, Hellingly, and to a lesser extent Polegate, areas. This area is set to have the highest concentration of new housing development in the county with 10,000 new households being projected by 2037 in the emerging Wealden Local Plan. Since the start of the IWMSC in 2003 until 2014, the local population grew by 12%. Waste tonnages at Hailsham HWRS have also steadily increased in recent years.

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<sup>1</sup> The Waste & Resources Action Programme (WRAP) works with businesses, individuals and communities to achieve a circular economy through helping them reduce waste, develop sustainable products and use resources in an efficient way

<sup>2</sup> The 2004 National Assessment of Civic Amenity Sites, NACAS, was the largest research project to have been carried out into Civic Amenity (CA) sites in the UK and is still considered relevant for benchmarking purposes

## Part 4 – Assessment of impact

### 4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

#### a) How is this protected characteristic reflected in the County/District/Borough?

Table 1: Population estimates for 2016, East Sussex and Districts/Boroughs (Percentage)

Age group	0-15	16-24	25-34	35-44	45-54	55-64	65-74	75-84	85+
East Sussex	17.1	9.2	9.8	10.8	14.7	13.2	13.4	7.9	4
Eastbourne	17.2	10.1	11.2	11.5	13.4	11.9	12.3	7.8	4.5
Hastings	18.7	10.5	12.3	11.8	14.9	12.4	11	5.6	2.8
Lewes	17.4	8.8	9.6	11.1	14.9	13.2	13.1	8	4
Rother	15.1	8.2	7.8	9	14.1	14.3	16.7	9.8	5
Wealden	17.2	8.6	8.9	10.6	15.4	13.8	14	7.9	3.6

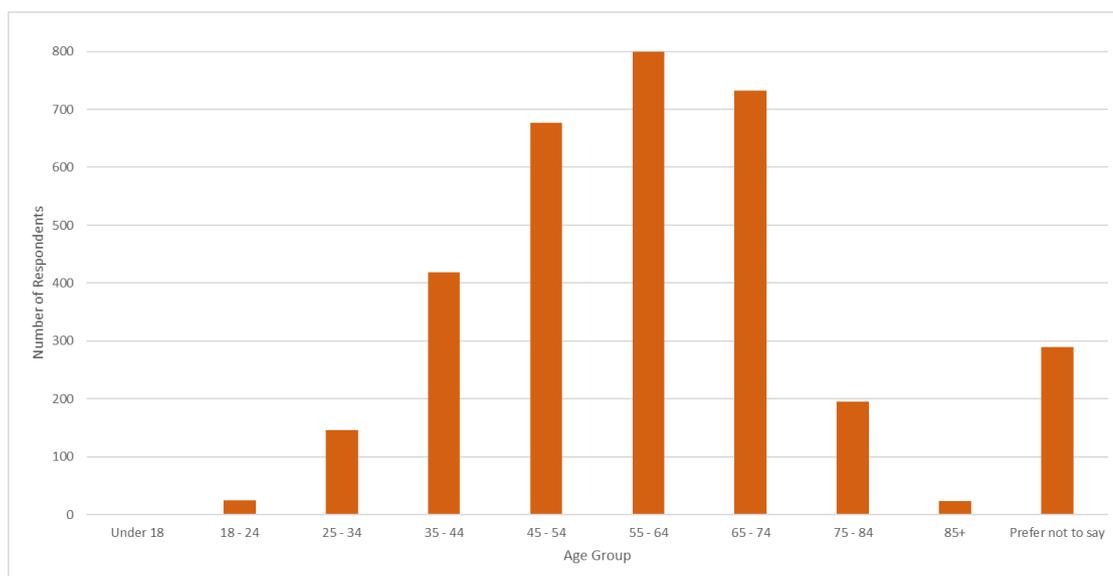
Source: East Sussex in Figures, (ONS revised mid-year estimates - revised district level data, March 2018)

#### b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

Table 2: Age of consultation respondents and satisfaction survey data compared to County population estimates

Age Group	HWRS consultation survey respondents, 2018		HWRS Customer Satisfaction Survey, 2016: East Sussex site user respondents		East Sussex 2016 population estimate
	No.	Percentage	No.	Percentage	Percentage
Under 16	0	0.0	0	0.0	17.1
16-24	27	0.8	5	0.7	9.2
25 - 34	146	4.4	26	3.6	9.8
35 - 44	418	12.6	91	12.7	10.8
45 - 54	677	20.5	159	22.1	14.7
55 - 64	799	24.2	171	23.8	13.2
65 - 74	732	22.1	158	22.0	13.4
75+	219	6.6	92	12.8	11.9
Prefer not to say	289	8.7	17	2.4	n/a
<b>Total</b>	<b>3,307</b>	<b>100</b>	<b>719</b>	<b>100</b>	<b>100</b>

Chart 1: Age of consultation respondents, 2018



It appears that a greater proportion, some 81% of our site users are aged 35 to 74, as evidenced by the 2016 customer satisfaction survey, compared to the general county population at 52%.

This is mirrored in our consultation with 79%, or 2,626 respondents being in the 35-74 age group - although 9% (or 289 respondents) chose not to tell us their age. The majority of these, 67% (2,208 people), were in the 45-74 age group. This is concurrent with the satisfaction survey site users, with some 68% being in the 45-74 age group.

Neither our consultation respondents nor the users of our sites surveyed in 2016, reflect the proportion of the general population in the county up to 34. Significantly less of this age group appear to use our sites and have responded to the consultation. That is to be expected as children under 16 are not permitted to use the sites for their own safety, and according to ONS data (2017), one in four people aged 20-34 are still living with family.

Although the site users surveyed in 2016 showed similar proportions of those aged 75 and over at 13% to those in the 2016 county population estimate at 12%, consultation respondents of this age numbered just 7% of the total, that is 219 people. We would expect service-users to be more likely to feel invested in the future of the sites and to respond to the consultation.

We have made efforts to reach all residents aged 16 and over with our consultation publicity and communications, however it is possible that we haven't reached those of 75 and over as well as we reached other age groups that use the sites. However, we directly emailed several local representative groups, including Age UK and seniors' forums (see the Consultation report, Appendix 1 of the Cabinet report) and the Consultation Hub indicated that we could be contacted by telephone or email to request the survey in other formats such as a paper copy. We also advertised the consultation in a variety of ways, including leaflets and posters, banners at the sites and a press release, as well as online.

However, it could be that the more elderly in general were less aware of the different ways they could share their views, i.e. on paper as well as online. Those aged 75 and over are less likely to go online than any other age group over 16 (Source: Adults' Media Use and Attitudes Report, Ofcom, 2018).

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

Proposal 1: Charge for certain non-household wastes at our sites

People of all ages on low incomes may be more impacted by this proposal and therefore disadvantaged in terms of the cost of disposing of non-household waste. Particularly the elderly and young, working families who might be on lower incomes. After housing costs, 16% of pensioners were in poverty in 2015/16 (Source: Poverty in later life, Age UK, 2018). The Child Poverty Action Group says statistics show that families are 'stuck on low pay while living costs rise'.

Proposal 2: Closure of Wadhurst and Forest Row sites

The elderly who live in the catchment areas of these sites and don't feel able to drive far, and those in the immediate area who don't have transport, may be more affected by the proposals.

Although those aged 65 and over comprise some 35% of our East Sussex site user respondents to our satisfaction survey, those that mainly use Forest Row and Wadhurst who are in that age group only comprise some 13% of the total number of consultation respondents (452 out of 3,385 people). Not all of those affected will need to make a significantly longer journey to reach an alternative site. Our analysis of journey times showed that few site-users within the catchment area of the Forest Row site would need to travel more than an extra 10 minutes each way (see the Habitats Regulation Assessment, Appendix 3 to the Cabinet report).

Respondents to the consultation survey who told us they use either the Forest Row or Wadhurst site most often and who are in the 75 plus age group comprise some 4% of the total number of respondents (133 out of 3,385 people). Of those, not all will need to make a significantly longer journey to reach an alternative site. However 5% of survey respondents, who said they use the Forest Row or Wadhurst sites most often, chose not to tell us their age group (161 out of 3,385 people).

We know that of 195 East Sussex and Brighton and Hove residents surveyed in our 2016 customer satisfaction survey that don't use the sites, 14% gave the reason as due to being elderly. Alongside that some also cited lack of transport or not needing to use the sites as additional reasons.

We are aware that a few residents who live near the Forest Row or Wadhurst sites are walking with their waste to the Forest Row or Wadhurst site, and the closure will certainly inconvenience them, especially if they don't have transport. We know that this likely to be a very small proportion of users overall, and our satisfaction survey would suggest less than 1% of site-users overall bring their waste to the sites on foot.

We also know that a proportion of site-users (around 9% estimated from the satisfaction survey) need help for their waste to be taken to a site. This is likely to include some of the more elderly members of the population who do not drive. Most of those that need help say they make informal arrangements with family, friends or neighbours. We believe these informal arrangements are likely to continue, even if local sites are closed.

The elderly and other age groups such as young, working families could be on lower incomes and so disadvantaged in terms of the slightly greater cost of a slightly longer journey to an alternative.

Residents of all ages who live in close proximity to one of the sites proposed for closure would be impacted by the inconvenience of having further to travel to an alternative site. Those residents that are retired and with transport may be least impacted as they are

more likely to have more available time to travel further to dispose of their waste, compared to residents that work or who have young families.

#### Proposal 3: Change opening hours at certain sites to better suit demand

Those of working age are more likely to benefit from our proposal to open some of the sites at weekends, and some 58% of the East Sussex population are of working age, being 16-64.

Those of working age could also be somewhat disadvantaged by the proposal to reduce opening hours slightly at either end of the day. Retired people of 65+ are less likely to be impacted by the changes to opening hours as they are more likely to have the flexibility to travel at different times of the day.

#### **d) What is the proposal, project or service's impact on different ages/age groups?**

##### Proposal 1: Charge for certain non-household wastes at our sites

Most respondents (56%) (1,920 people) found the proposal broadly acceptable.

Of those over 25, the consultation respondents in the 75-84 age group, and 85+ groups were the least likely to oppose the proposal, with 16% (31 people) and 8% (2 people) respectively finding the proposal widely unacceptable.

Of the 35-74 age groups, between 25 and 31% of respondents, found the proposal unacceptable. However, there was an exception in the case of respondents in the 24-34 year old age group, of whom 39% (57 people) found the proposal generally unacceptable, whilst 13% (19 people) were neutral about it. It should be noted though that these comprised only 2% (76 people) of the total respondents. These respondents could be young families on relatively low incomes.

##### Proposal 2: Closure of Wadhurst and Forest Row sites

Of those consultation respondents over 25, those of 75 and over were more likely to disagree (by an average of 16 percentage points) that if Forest Row and Wadhurst recycling sites were to close, the remaining ten sites across the county would give residents reasonable access to the service.

##### Proposal 3: Change opening hours at certain sites to better suit demand

For the proposal to slightly reduce opening times at either end of the day, 70% (2,362 people) found this broadly acceptable. However, of the different age groups responding, the 18-64 groups of working age were on average 14 percentage points more likely to find the proposal unacceptable, compared to those of retirement age.

Most consultation respondents (excluding those that didn't use these two sites or feel the question was applicable), found the proposal to open the Eastbourne and Crowborough sites for longer at weekends and close them earlier in the week broadly acceptable, that is 70% or 1,774 people. Just 8% (195 people) indicated that they found this proposal generally unacceptable. Those of working age (i.e. 18-64 age groups) were just 1 percentage point on average more likely to find the proposals unacceptable.

#### **e) What actions are to/or will be taken to avoid any negative impact or to better advance equality?**

- The District and Borough Councils will continue to provide comprehensive kerbside recycling collections, which benefit elderly people who are less mobile as there is less need to travel to recycling sites. The District and Borough Councils will continue to provide an 'assisted collection' service which gives extra help for

elderly residents who are too infirm to move their rubbish or recycling containers to the edge of their property. The Council's website ([www.eastsussex.gov.uk/recyclemore](http://www.eastsussex.gov.uk/recyclemore)) publicises the assisted collections. The County Council will continue to help the Waste Collection Authorities (WCAs) promote their kerbside recycling collections and their local recycling points, and with the agreement of the WCAs would aim to encourage families through social media to let their relatives know about the assisted collection service.

- The County Council will continue to promote other services on the Council website that reduce the need for the elderly to travel to sites such as collections from the WCAs for clinical waste, kerbside garden waste, and bulky waste and home collections of reusable furniture by the charities. With the agreement of the WCAs (if their policies allow), the County Council would aim to further promote how to request extra rubbish bins or recycling containers where appropriate.
- Previous consultation also highlighted that the design of reduced-price home compost bins being offered needs to be appropriate for use by the elderly, i.e. with the door located at the bottom of container, and we will continue to offer this type of composter.
- The HWRS network offered through the waste service, including the reuse shops will continue to be advertised via the County Council's website: [www.eastsussex.gov.uk/recycling](http://www.eastsussex.gov.uk/recycling) sites. We would aim to promote the service and what it can offer to specific groups via our social media channels (Twitter and Facebook), eg low cost items at the reuse shops, convenient opening hours for working people, etc.

**f) Provide details of the mitigation.**

The potential impacts of the service changes are likely to be small. The current network of 12 sites and free disposal of non-household waste provides residents with a level of service that is higher than is legally required. The charges proposed for non-household waste have been calculated in order to cover the costs of the scheme and of disposal of the waste, and no profit would be received.

In terms of the proposal to extend the opening hours of the Eastbourne and Crowborough sites at weekends. This would benefit and help mitigate, at least in the catchment areas for those sites, negative effects on those of working age of reducing opening hours slightly during the week. Similarly, making improvements to the Hailsham site in terms of ease of use and feelings of safety may help mitigate negative effects to working age people in the catchment area of that site as a result of reducing opening hours slightly during the week.

The County Council will continue to provide a network of ten HWRSs across the county which will provide reasonable access for all residents. We will continue to work with site staff to ensure that additional help on site is provided when requested, including carrying bags of waste to the containers for those that are less physically able. We will also continue to advertise this additional support that is already available, via the County Council's website.

Prior to the closure of Forest Row and Wadhurst HWRS, we would advertise to users of these two sites the date of closure and their closest alternative site, through marketing at sites and on the County Council's website.

Prior to the introduction of charges for non-household waste we would advertise these changes at the network of HWRSs in East Sussex. We would also clearly advertise any changes to opening hours of the sites prior to the introduction of these changes, to ensure

that all residents are informed. This will be done through marketing at sites as well as on the County Council's website.

We will continue to work with District and Borough councils to ensure that residents are well informed of the ranges of ways that they can dispose of their waste and will continue to promote on our website the alternatives to visiting a HWRS, including kerbside recycling, green waste kerbside collection, bulky waste kerbside collection and household waste collection.

Council waste team officers have engaged with Wadhurst and Forest Row Parish Councillors and District Councillors to investigate potential options for alternative services provided by the community or business sector. If the decision is made to close sites, it is recommended to Cabinet that this engagement continues following closure.

**g) How will any mitigation measures be monitored?**

We will continue to monitor the number of users at each of our sites, to compare the number of users before and after the changes have taken effect.

We will also monitor the levels of non-household waste entering our sites to assess the impact of the introduction of charges.

We will continue to monitor the responses to our customer satisfaction surveys and feedback from representative groups.

**4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic reflected in the County /District/Borough?**

Table 3: Residents with limiting long-term illness and disability, East Sussex and District (Percentage)

	East Sussex	Eastbourne	Hastings	Lewes	Rother	Wealden
People with long-term health problem or disability	20.3	21	22.1	19.5	23.4	17.5
People without long-term health problem or disability	79.7	79	77.9	80.5	76.6	82.5
Day-to-day activities limited a little	11.2	11.3	11.5	10.9	12.8	10.2
Day-to-day activities limited a lot	9.2	9.7	10.6	8.7	10.7	7.3

Source: Census 2011, East Sussex in Figures.

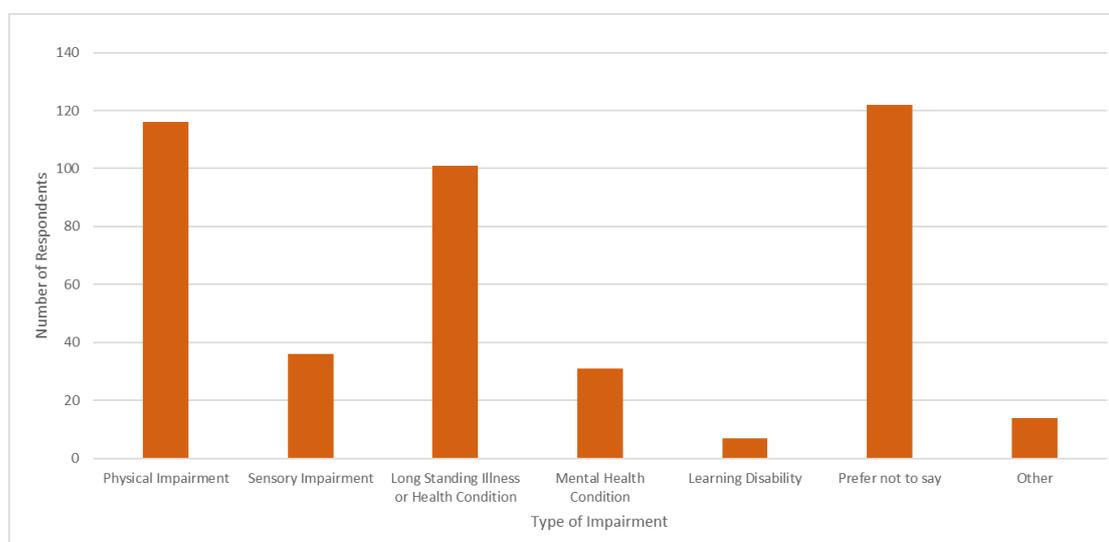
Note that 'Day-to-day activities limited a little' and 'Day-to-day activities limited a lot' are as a proportion of the percentage of those with a long-term health problem or disability.

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 4: Survey respondents who consider themselves disabled as set out in the Equality Act 2010 compared with satisfaction survey data.

	HWRS consultation survey respondents, 2018		HWRS Customer Satisfaction Survey, 2016: East Sussex site users	
	No.	Percentage	No.	Percentage
Yes	224	7	45	6
No	2,738	83	666	93
Prefer not to say	318	10	8	1
<b>Total</b>	<b>3,280</b>	<b>100</b>	<b>719</b>	<b>100</b>

Chart 2: Type of impairment reported by HWRS consultation survey respondents, 2018



In 2016/17, 19% of adults of working age and 45% of adults over State Pension age reported a disability under the terms of Equality Act 2010, with mobility being the most prevalent impairment reported (Source: Family Resources Survey 2016/17).

In the 2011 county data, some 20% of people had a long-term health problem or disability, and in 9% of those their day-to-day activities were significantly limited.

This isn't directly comparable with the responses to the question in the consultation survey, about whether people considered themselves disabled as set out in the Equality Act 2010. The proportion of respondents who told us they are disabled was much less than this at 7% (224 people), and of those that told us the type of impairment they had, a physical impairment was the most frequently reported at 38% (by 116 people), followed closely by a long standing illness or health condition (101 people), with 71% having either a physical impairment or a long standing illness or health condition. 12% of all

respondents chose not to tell us whether they were disabled or not, which could have affected the outcome.

This does reflect our latest customer satisfaction survey, to which 6% of respondents who use East Sussex sites told us they were disabled under the terms of the Equality Act 2010.

Although it is our policy to offer assistance at the HWRSs for those that need it, our satisfaction survey showed that some 4% of respondents do not visit the sites because they are disabled.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

Proposal 1: Charge for certain non-household wastes at our sites

Those with a disability may have less income than other working age adults and so be disadvantaged in terms of the charges for waste. The Equality and Human Rights Commission 2017 report cites a disability pay gap of 13.6%. On top of that, disabled people are significantly more likely to be unemployed or in low-waged work than non-disabled people (Source: [www.gov.uk/government/publications/disability-facts-and-figures/disability-facts-and-figures](http://www.gov.uk/government/publications/disability-facts-and-figures/disability-facts-and-figures)).

Proposal 2: Closure of Wadhurst and Forest Row sites

Respondents to the consultation survey who told us they use the Forest Row or Wadhurst sites most often who also reported that they have a disability comprise 3.2% of the total number of respondents (108 out of 3,385 people). Of those, it is unlikely that all would need to make a significantly longer journey to reach an alternative site, or ask someone to do so on their behalf. The survey respondents who said they use the Forest Row or Wadhurst sites most often and chose not to tell us if they had a disability were 5.8% of the total (197 out of 3,385 people).

Assistance is available on request at the sites for taking items to the correct recycling containers. Hatched disabled parking spaces are available at all the sites except Forest Row and Hailsham. We also know that around 9% of site-users need help for their waste to be taken to a site. This is likely to include some disabled members of the population who cannot easily access the sites. Most of those that need help say they make informal arrangements with family, friends or neighbours. We believe these informal arrangements are likely to continue, even if local sites are closed.

Proposal 3: Change opening hours at certain sites to better suit demand

People with this protected characteristic are not expected to be any more affected than the non-disabled. This was not highlighted as a significant issue as no consultation respondent made specific comments that the proposed changes to opening hours were a problem in terms of any disability, and it is not expected that shutting a site slightly earlier would cause a significant impact.

**d) What is the proposal, project or service's impact on people who have a disability?**

Proposal 1: Charge for certain non-household wastes at our sites

This proposal showed the most significant difference between the responses of the disabled and those without a disability. Of the respondents overall, 30% (1,006 people) felt that the proposal was broadly unacceptable, which rose to 34% (86 people) for those that consider themselves disabled. This accounted for 7% of respondents to the survey

overall and could be due to the disability pay gap and the likelihood of unemployment or low-waged work as outlined in section c) above.

#### Proposal 2: Closure of Wadhurst and Forest Row sites

Respondents with a disability were slightly less likely (by three percentage points) to disagree that if we close the proposed sites, the remaining sites would give residents reasonable access to the service, than those without a disability.

#### Proposal 3: Change opening hours at certain sites to better suit demand

Of the respondents overall, 18% (604 people) felt that the proposal for slightly shorter opening hours was unacceptable. Respondents with a disability were to some extent more likely to oppose the slightly shorter opening times. Those that opposed the changes accounted for 19% of disabled respondents, which is 48 people and 1% of the total consultation respondents.

#### **e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

- Work to ensure that customers who need assistance at the site are offered help or advice when requested: Of the 719 HWRS-user respondents to our customer satisfaction survey, 41% said they needed assistance at the site, and of those 8% said assistance wasn't offered to them or provided when requested. However the question didn't ask whether the help was required due to a disability. People may have wanted help in terms of directions to the right place to deposit their waste.
- Work with Veolia to include questions in the HWRS customer satisfaction survey to ask why assistance is required, e.g. because of a particular disability, etc., whether help was requested or not, and whether the respondent received the help they needed. The customer satisfaction survey is usually undertaken every 2 years and is next due in 2019.
- The District and Borough Councils will continue to provide comprehensive kerbside recycling collections, which benefit those who are less mobile as there is less need to travel to recycling sites. The District and Borough Councils will continue to provide an 'assisted collection' service which gives extra help for residents who are unable to move their rubbish or recycling containers to the edge of their property. The Council's website ([www.eastsussex.gov.uk/recyclemore](http://www.eastsussex.gov.uk/recyclemore)) publicises the assisted collections. The County Council will continue to help the Waste Collection Authorities (WCAs) promote their kerbside recycling collections.
- The County Council will continue to promote other services on the Council website that reduce the need for people to travel to sites such as collections from the WCAs for clinical waste, kerbside garden waste, and bulky waste and home collections of reusable furniture by the charities. With the agreement of the WCAs (if their policies allow), the County Council would aim to promote how to request extra rubbish bins or recycling containers where appropriate.
- The HWRS network offered through the waste service, including the reuse shops will continue to be advertised via the County Council's website: [www.eastsussex.gov.uk/recyclingsites](http://www.eastsussex.gov.uk/recyclingsites). We would aim to promote the service and what it can offer to specific groups via our social media channels (Twitter and Facebook), e.g. low cost items at the reuse shops.

**f) Provide details of any mitigation.**

The potential impacts of the service changes are likely to be small. The current network of 12 sites and free disposal of non-household waste provides residents with a level of service that is higher than is legally required. The charges proposed for non-household waste have been calculated in order to cover the costs of the scheme and of disposal of the waste, and no profit would be received

We will continue to provide a network of ten HWRSs across the county which will provide reasonable access for all residents. We will continue to work with site staff to ensure that additional help on site is provided when requested, including carrying bags of waste to the containers for those that are less physically able. We will also continue to advertise this additional support that is already available, via the County Council's website. Hatched disabled parking spaces will continue to be available at all the remaining sites, and plans for the Hailsham site will consider improving accessibility.

Prior to the closure of Forest Row and Wadhurst HWRS, we would advertise to users of these two sites the date of closure and their closest alternative site, through marketing at sites and on the County Council's website.

Prior to the introduction of charges for non-household waste we would advertise these changes at the network of HWRSs in East Sussex. We would also clearly advertise any changes to opening hours of the sites prior to the introduction of these changes, to ensure that all residents are informed. This would be done through marketing at sites as well as on the County Council's website.

We will continue to work with District and Borough councils to ensure that residents are well informed of the ranges of ways that they can dispose of their waste and will continue to promote on our website the alternatives to visiting a HWRS, including kerbside recycling, green waste kerbside collection, bulky waste kerbside collection and household waste collection.

We will continue to listen to feedback from site users to try to continue to improve the accessibility of our HWRS.

**g) How will any mitigation measures be monitored?**

We will continue to monitor the proportion of disabled customers using the sites via the regular customer satisfaction survey, compared to prior to the changes taking effect.

We will continue to monitor the responses to our customer satisfaction surveys and feedback from representative groups.

**4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact.** Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

**a) How is this protected characteristic reflected in the County /District/Borough?**

Table 5: Ethnic group in 2011 – East Sussex and Districts (Percentage)

Ethnicity	All White	All Mixed	All Asian or Asian British	All Black or Black British	Other ethnic group
East Sussex	96	1.4	1.7	0.6	0.3
Eastbourne	94.1	1.8	2.8	0.8	0.5
Hastings	93.8	2.2	2.4	1.2	0.5
Lewes	96.6	1.3	1.4	0.4	0.3
Rother	97.1	1.1	1.2	0.3	0.2
Wealden	97.5	1	1.2	0.2	0.2

Source: Census 2011, East Sussex in Figures

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 6: Ethnic group proportions of consultation respondents compared to county census data

Ethnic group	HWRS consultation survey respondents, 2018		East Sussex ethnic groups, 2011
	No.	Percentage	Percentage
All White	2,841	88.6	96.0
All Mixed	17	0.5	1.4
All Asian or Asian British	8	0.2	1.7
All Black or Black British	1	0.0	0.6
Other ethnic group	26	0.8	0.3
Prefer not to say	312	9.7	n/a
<b>Total</b>	<b>3,205</b>	<b>100</b>	<b>100</b>

Although the consultation survey respondents are mainly from the 'all white' ethnic group like the county census data, the proportion of our consultation survey respondents who answered the ethnicity question is lower in terms of all the ethnic groups including 'all white', except the 'other ethnic group' category which was slightly higher, when compared with the East Sussex ethnic group data of 2011. However 10% of the respondents (312 people) to the ethnicity question preferred not to say (and 180 people chose not to answer the question), so this may not be entirely reflective of the reality, and in addition the ethnic composition of the county may have changed in the past 6 to 7 years.

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

The proposals are not expected to have any specific impact on individuals from different ethnic backgrounds as it is considered that the service will continue to meet or support the needs of current and future customers, regardless of ethnicity.

- d) **What is the proposal, project or service's impact on those who are from different ethnic backgrounds?**

See above.

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

n/a

- f) **Provide details of any mitigation.**

n/a

- g) **How will any mitigation measures be monitored?**

n/a

#### 4.4 **Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact**

- a) **How is this protected characteristic target group reflected in the County/District/Borough?**

Table 7: Population by gender in 2011 – East Sussex and Districts (Percentage)

	Females	Males
East Sussex	51.8	48.2
Eastbourne	52.2	47.8
Hastings	51.2	48.8
Lewes	51.4	48.6
Rother	52.5	47.5
Wealden	51.8	48.2

Source: Census 2011, East Sussex in Figures

Statistics about the number of transgender people are not available from the 2011 Census. However, the Gender Identity Research & Education Society estimates that about 1% of the British population are gender nonconforming to some degree with numbers of trans boys and trans girls being about equal.

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 8: Gender of consultation respondents compared to county census data and satisfaction survey data

	HWRS consultation survey respondents, 2018		HWRS Customer Satisfaction Survey, 2016: East Sussex site users		East Sussex data, 2011
	No. of Respondents	Percentage	No. of Respondents	Percentage	Percentage
Male	1511	46	273	38	48
Female	1531	46	446	62	52
Prefer not to say	261	8	n/a	n/a	n/a
Total	3303	100	719	100	100

Of the consultation survey respondents, 8% chose not to say (and 82 people chose not to answer the question), so the gender split of respondents shown may not be entirely reflective of the reality.

Although of those that gave their gender, there appeared to be particularly less women compared to the East Sussex percentages. A greater proportion of site users could be female than in the general East Sussex population, as suggested by the HWRS satisfaction survey, or it may be that more women than men chose to answer the phone to the survey interviewer, or agreed to complete the telephone survey.

0.5% of respondents to our 'About You' question on gender in the consultation survey describe themselves as a transgender or trans person. This is a little less than the estimate of about 1% of the British population being gender nonconforming (Source: The Gender Identity Research & Education Society), but it is not greatly inconsistent.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

One gender is not expected to be any more affected than another.

**d) What is the proposal, project or service's impact on different genders?**

See above.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

n/a

**f) Provide details of any mitigation.**

n/a

**g) How will any mitigation measures be monitored?**

n/a

**4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic target group reflected in the County/District/Borough?**

Table 9: Marital status in 2011 - East Sussex and Districts (Percentage)

Marital Status	Single	Married	In a registered same-sex civil partnership	Separated	Divorced	Widowed
East Sussex	29.1	48.4	0.3	2.7	10.7	8.7
Eastbourne	33.3	42.8	0.4	3	11.5	9.1
Hastings	36.5	39.2	0.3	3.7	12.8	7.4
Lewes	28.7	49.6	0.5	2.5	10.2	8.4
Rother	24.7	51.3	0.3	2.6	10.3	10.8
Wealden	24.9	55.1	0.2	2.3	9.4	8.2

Source: Census 2011, East Sussex in Figures

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 10: Partnership status of consultation respondents compared to county census data

Response to are you married or in a civil partnership question	HWRS consultation survey respondents, 2018		East Sussex population, 2011
	No. respondents	Percentage	Percentage
Yes	1,947	61	49
No (in ESiF includes single, separated, divorced or widowed).	675	21	51
Prefer not to say	593	18	n/a
<b>Total</b>	<b>3,215</b>	<b>100</b>	<b>100</b>

The survey respondents appeared to have a higher percentage of married (or in a civil partnership) people than the East Sussex population and a lower percentage of unmarries. However, 18% preferred not to say (and 170 people chose not to answer the question), making it more difficult to compare with the East Sussex 2011 data, and in addition the marital make-up of the county may have changed in the past 6 to 7 years.

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

The County Council HWRS service is provided to all residents, irrespective of their marital status and therefore those with this protected characteristic are not expected to be more impacted by the changes.

- d) **What is the proposal, project or service's impact on people who are married or same sex couples who have celebrated a civil partnership?**

See above.

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

n/a

- f) **Provide details of any mitigation.**

n/a

- g) **How will any mitigation measures be monitored?**

n/a

#### 4.6 **Pregnancy and maternity: Testing of disproportionate, negative, neutral or positive impact.**

- a) **How is this protected characteristic target group reflected in the County/District/Borough?**

The crude birth rate per 1000 of population in East Sussex in 2016 was 9.5 (source: East Sussex in Figures), or around 1% of the population.

- b) **How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 11: Response to the 2018 HWRS consultation question: Are you currently pregnant or have you been pregnant in the last year?

	No. respondents	Percentage
Yes	27	1
No	2,573	82
Prefer not to say	522	17
<i>Total</i>	3,122	100

1% of the respondents were pregnant or had been in the last year which is fairly reflective of the 1% birth rate in East Sussex. Although 17% preferred not to say (and 263 people chose not to answer the question), so this may not be entirely reflective of the reality.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

It is considered that pregnant women and those in the first few weeks of maternity leave will be less likely to be taking items to the sites and carrying them.

**d) What is the proposal, project or service's impact on pregnant women and women within the first 26 weeks of maternity leave?**

People with this protected characteristic that currently use Forest Row or Wadhurst, may find it difficult to drive further to an alternative HWRS. They may also be on low income, due to maternity leave and therefore be less likely to be able to afford the charges for non-household waste.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

- Work to ensure that customers who need assistance at the site are offered help or advice when requested: Of the 719 HWRS-user respondents to our customer satisfaction survey, 41% said they needed assistance at the site, and of those 8% said assistance wasn't offered to them, or provided when requested. However the question didn't ask whether the help was required due to pregnancy.
- Include an HWRS customer satisfaction survey question to ask why assistance is required, e.g. because of pregnancy, etc., and whether the respondent received help. The customer satisfaction survey is usually undertaken every 2 years and is next due in 2019.
- The District and Borough Councils will continue to provide comprehensive kerbside recycling collections, which benefit those who are less mobile as there is less need to travel to recycling sites. The County Council will continue to help the Waste Collection Authorities (WCAs) promote their kerbside recycling collections.
- The County Council will continue to promote other services on the Council website that reduce the need for people to travel to sites such as collections from the WCAs for clinical waste, kerbside garden waste, and bulky waste and home collections of reusable furniture by the charities.
- The HWRS network offered through the waste service, including the reuse shop will continue to be advertised via the County Council's website [www.eastsussex.gov.uk/recyclingsites](http://www.eastsussex.gov.uk/recyclingsites). We would aim to promote the service and what it can offer to specific groups via our social media channels (Twitter and Facebook), e.g. low cost items at the reuse shops.

**f) Provide details of the mitigation**

We will continue to provide a network of ten HWRSs across the county which will provide reasonable access for all residents. We will continue to work with site staff to ensure that additional help on site is provided when requested, including carrying bags of waste to the containers for those that are less physically able. We will also continue to advertise this additional support that is already available, via the County Council's website.

The charges proposed for non-household waste have been calculated in order to cover the costs of the scheme and of disposal of the waste, and no profit would be received

Prior to the introduction of charges for non-household waste we would advertise these changes at the remaining of HWRSs in East Sussex. We would also clearly advertise any

changes to opening hours of the sites prior to the introduction of these changes, to ensure that all residents are informed. This will be done through marketing at sites as well as on the County Council's website.

We will continue to work with District and Borough councils to ensure that residents unable to visit a HWRS as frequently, are well informed of the ranges of ways that they can dispose of their waste and will continue to promote on our website the alternatives to visiting a HWRS, including kerbside recycling, green waste kerbside collection, bulky waste kerbside collection and household waste collection.

**g) How will any mitigation measures be monitored?**

We will continue to monitor customer feedback, to ensure the required help at sites is provided.

**4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic reflected in the County/District/Borough?**

Table 12: Religion in 2011 – East Sussex and Districts (Percentage)

Religions	East Sussex	Eastbourne	Hastings	Lewes	Rother	Wealden
Christian	59.9	59.6	51.9	57	64.8	64
Buddhist	0.4	0.5	0.5	0.5	0.3	0.3
Hindu	0.3	0.4	0.5	0.3	0.2	0.1
Jewish	0.2	0.2	0.2	0.3	0.2	0.2
Muslim	0.8	1.5	1.3	0.6	0.5	0.4
Sikh	0	0.1	0	0	0	0
Other religions	0.7	0.6	0.7	0.6	0.6	0.8
No religion	29.6	29.2	36.6	32.5	25.2	26.3
Religion not stated	8.1	8	8.3	8.2	8.2	7.9

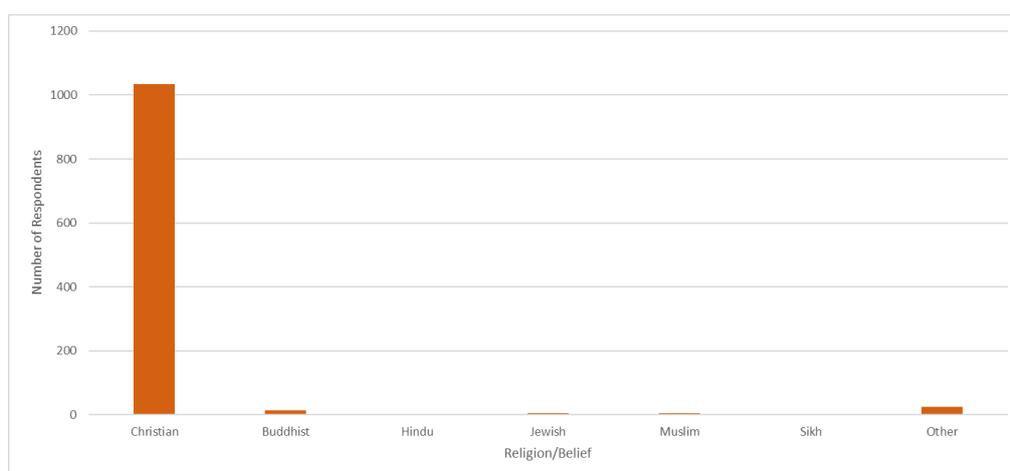
Source: Census 2011, East Sussex in Figures

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 13: Religion of consultation respondents compared to county census data.

Respondents' religion	HWRS consultation survey respondents, 2018		East Sussex data, 2011
	No. of Respondents	Percentage	Percentage
Christian	1,035	31.9	59.9
Buddhist	15	0.5	0.4
Hindu	2	0.1	0.3
Jewish	5	0.2	0.2
Muslim	5	0.2	0.8
Sikh	0	0.0	0
Other	24	0.7	0.7
No religion	1,541	47.5	29.6
Prefer not to say or not stated	615	19.0	8.1
<i>Total</i>	<i>3,242</i>	<i>100</i>	<i>100</i>

Chart 3: Religions/beliefs of HWRS consultation survey respondents, 2018



Levels of the smaller religious groups in the county are broadly reflected in the survey respondents, however there are less Christians and more non-religious people than the 2011 East Sussex data. It is likely that this is down to the 19% who preferred not to state their religious orientation, and 143 people chose not to answer the question. Or it is possible that the religious composition of the county may have changed in the past 6 to 7 years.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

Proposals 1 and 2 are not generally expected to have a disproportionate impact on individuals from any religion as it is considered that the service will continue to meet or support the needs of customers, regardless of religious beliefs.

Proposal 3: Change opening hours at certain sites to better suit demand

Some religions have specific days that they would not carry out work on a 'Sabbath'. This may fall on a particular day of the week and mean that changing the days or times that a site is open may impact on certain religious groups. For those of the Jewish faith, the Sabbath is on a Saturday and Christians may restrict their activities on a Sunday. So for these groups in the Eastbourne or Crowborough site catchment areas, opening at the weekend and closing earlier in the week may cause a slight disadvantage. Hindus, Muslims and Sikhs do not observe a Sabbath, and Buddhists do not observe a specific weekly holy day.

**d) What is the proposal, project or service's impact on the people with different religions and beliefs?**

Proposal 3: Change opening hours at certain sites to better suit demand

Of the faiths that we asked about (Buddhist, Christian, Hindu, Jewish, Muslim, Sikh), Muslim (5 people) and Jewish (5 people) respondents were significantly more likely to find the proposals overall unacceptable as a way to make savings than the other specific faiths. However, this is a very small sample, and possibly not representative.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

We would clearly advertise any changes to opening hours of the sites prior to their introduction to ensure that all residents are informed and aware of week-day opening times. This would be done through marketing at sites as well as on the County Council's website.

We will continue to monitor feedback from customers and any complaints regarding this protected characteristic to better advance equality.

**f) Provide details of any mitigation.**

n/a

**g) How will any mitigation measures be monitored?**

n/a

**4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.**

**a) How is this protected characteristic reflected in the County/District/Borough?**

No local data is available on sexual orientation. National and regional estimates are as follows:

Table 14: Sexual identity in the UK, 2016 (Percentage)

	UK	South East
Heterosexual or straight	93.4	90.1
Gay or lesbian	1.2	2.1
Bisexual	0.8	0.6
Other	0.5	0.5
Don't know or refuse	4.1	6.7

Source: Annual Population Survey, Office for National Statistics

**b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Table 15: Sexual orientation of consultation respondents compared to regional data for the SE.

	HWRS consultation survey respondents, 2018		South East estimate, 2016.
Sexual orientation	No. respondents	Percentage	Percentage
Heterosexual	2,164	70.0	90
Gay woman or man	47	1.5	2
Bi/Bisexual	26	0.8	1
Other	47	1.5	1
Don't know or prefer not to say	807	26.1	5
Total	3,091	100	99

Levels of gay, bi and 'other' sexual orientations in the survey respondents broadly reflect the SE data, however there are significantly less heterosexual respondents than the 2016 SE estimates. It is likely that this is down to the 26.1% who preferred not to state their sexuality.

**c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

It is not anticipated that the changes will have a disproportionate impact on people with differing sexual orientation and we will continue to monitor feedback from customers and complaints regarding this protected characteristic to better advance equality.

**d) What is the proposal, project or service’s impact on people with differing sexual orientation?**

See above.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

n/a

**f) Provide details of the mitigation**

n/a

**g) How will any mitigation measures be monitored?**

n/a

**4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.**

**4.9.1 Additional Factor 1: Carers**

**a) How are these groups/factors reflected in the County/District/ Borough?**

Table 16: Provision of unpaid care in 2011 – East Sussex and District (Percentage)

	People provide no unpaid care	People provide unpaid care	Provides 1 to 19 hours unpaid care a week	Provides 20 to 49 hours unpaid care a week	Provides 50 or more hours unpaid care a week
East Sussex	88.7	11.3	7.5	1.3	2.5
Eastbourne	89.4	10.6	6.7	1.3	2.6
Hastings	89.5	10.5	6.3	1.5	2.7
Lewes	88.2	11.8	8.2	1.2	2.4
Rother	87.6	12.4	8	1.4	3
Wealden	88.8	11.2	8	1.2	2.1

Source: Census 2011, East Sussex in Figures

**b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

Not asked in customer satisfaction survey or consultation survey.

- c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

Proposal 2: Closure of Wadhurst and Forest Row sites

Carers may have less flexibility to travel further to an alternative site if they are unable to leave those they are caring for longer periods.

Proposal 3: Change opening hours at certain sites to better suit demand

Carers may have less flexibility to visit at different times of day if they are unable to leave those they are caring for during the new times.

- d) What is the proposal, project or service's impact on the factor or identified group?**

Carers in the Forest Row or Wadhurst site catchment areas may visit these sites less often as they might not have the time to travel further to alternatives. The carers that use the other sites may also find it difficult to visit sites within the reduced opening hours.

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

With the agreement of the WCAs, we would promote alternative options for residents caring for the elderly, ill or disabled at home, such as potential extra waste containers (if WCA policies allow), clinical waste collections and home collections of reusable furniture by charities.

- f) Provide details of the mitigation.**

We will continue to provide a network of ten sites across the county with reasonable access to all residents. These sites will continue to be open during peak hours.

- g) How will any mitigation measures be monitored?**

Customer satisfaction surveys and customer feedback.

#### **4.9.2 Additional Factor 2: Literacy/Numeracy Skills**

- a) How are these groups/factors reflected in the County/District/Borough?**

There are areas of East Sussex which are among the top 10 most deprived wards in England for working age adults with no or low qualifications, or who cannot speak English well or at all. Parts of the county have an adult population with skills below a level which means they could compare products and services for the best buy, or work out a household budget.

There is variance across the county with Rother having the highest percentage of working age residents with no qualifications at 7.3% (3,600 residents), compared to Lewes with the lowest percentage at 3.7% (2,200 residents). Source: Annual Population Survey, 2017, East Sussex in Figures.

**b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

Not asked in customer satisfaction survey or consultation survey.

**c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

Those with low literacy, numeracy or language skills may have difficulty understanding any promoted service changes.

**d) What is the proposal, project or service's impact on the factor or identified group?**

Those with low literacy, numeracy or language skills could have issues working out the cost of waste they might want to dispose of if charges are introduced, or understanding the changes in opening times.

**e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

Clear signage at sites and simple, 'plain English' explanations of the changes on our website and within our promotion at the sites, using images as well as text where possible to illustrate changes.

Site staff will be fully briefed on the changes so that they can clearly explain them to all site users.

We will continue to monitor the responses to our customer satisfaction surveys and feedback.

**f) Provide details of the mitigation.**

n/a

**g) How will any mitigation measures be monitored?**

n/a

### 4.9.3 Additional Factor 3: Part time workers

a) **How are these groups/factors reflected in the County/District/Borough?**

Table 17: Hours worked in 2011 – East Sussex and District (Percentage)

	East Sussex	Eastbourne	Hastings	Lewes	Rother	Wealden
<b>In full-time employment</b>	<b>67.3</b>	<b>67.8</b>	<b>67.7</b>	<b>66.8</b>	<b>66.5</b>	<b>67.6</b>
Worked 31-48 hours	53.3	56	56.1	53.3	51	51.3
Worked 49 or more hours	14	11.9	11.6	13.5	15.5	16.3
<b>In part-time employment</b>	<b>32.7</b>	<b>32.2</b>	<b>32.3</b>	<b>33.2</b>	<b>33.5</b>	<b>32.4</b>
Worked 15 hours or less	11.2	10.7	9.7	11.4	11.6	12.1
Worked 16-30 hours	21.5	21.5	22.6	21.8	21.9	20.3

Source: Census 2011, East Sussex in Figures

b) **How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

Not asked in customer satisfaction survey or consultation survey.

c) **Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

Proposal 1: Charge for certain non-household wastes at our sites

Part time workers may have less income and therefore be more disadvantaged in terms of paying to take non-household waste to the sites.

Proposal 2: Closure of Wadhurst and Forest Row sites

Our data shows that Forest Row and Wadhurst visitors comprise about 5.2% of all East Sussex HWRS site visits. Part time workers who use these sites may be negatively impacted as they may have less income and therefore be less able to afford the cost of additional fuel to drive to an alternative site, unless they are able to combine their visit with a trip for other purposes.

On the other hand, part-time workers may have more time to travel further to an alternative site than those that work full time.

Proposal 3: Change opening hours at certain sites to better suit demand

The service could become less accessible for the proportion of the population who work at weekends and/or have other commitments before 4pm in the week.

d) **What is the proposal, project or service's impact on the factor or identified group?**

Proposal 1: Charge for certain non-household wastes at our sites

The charge for non-household waste is expected to have a relatively low impact on all users of our sites. The charges proposed for non-household waste have been calculated in order to cover the costs of the scheme and of disposal of the waste, and no profit would be received

### Proposal 2: Closure of Wadhurst and Forest Row sites

Some of the comments from survey respondents evidence that people are concerned about disadvantaging working people.

### Proposal 3: Change opening hours at certain sites to better suit demand

Although just 6% of respondents (or 195 people) overall indicated that found the proposal to open the Eastbourne and Crowborough sites for longer at weekends and close them earlier in the week unacceptable, those in the 25-74 age groups were on average 4 percentage points more likely to find the proposals unacceptable. It is possible that this age group includes a higher proportion of part-time workers who work at weekends and live in the catchment areas for these sites and feel disadvantaged by the proposal.

#### **e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

- We will continue to provide a network of ten sites across the county with reasonable access to all residents. These sites will continue to be open during peak times when demand is highest, during both weekdays and weekends.
- The District and Borough Councils will continue to provide comprehensive kerbside recycling collections, which benefit those less able to travel to recycling sites.

#### **f) Provide details of the mitigation.**

The potential impacts of the service changes are likely to be small. The current network of 12 sites and free disposal of non-household waste provides residents with a level of service that is higher than is legally required. The charges proposed for non-household waste have been calculated in order to cover the costs of the scheme and of disposal of the waste, and no profit would be received

We will ensure that the closure of Forest Row and Wadhurst sites is clearly communicated to site users prior to closure, the closest alternative sites will be advertised through marketing at these sites and on the County Council's website.

Prior to the introduction of charges for non-household waste we would advertise these changes at the network of HWRSs in East Sussex. We would also clearly advertise any changes to opening hours of the sites prior to the introduction of these changes, to ensure that all residents are informed. This will be done through marketing at sites as well as on the County Council's website.

The County Council will continue to work with District and Borough councils to promote other services on the Council website that reduce the need to visit the HWRSs, such as collections from the WCAs for clinical waste, kerbside garden waste, kerbside recycling collections, local recycling points, and bulky waste collection and home collections of reusable furniture by the charities.

#### **g) How will any mitigation measures be monitored?**

We will continue to monitor customer numbers at our sites and customer feedback.

#### 4.9.4 Additional Factor 4: Rurality

a) **How are these groups/factors reflected in the County/District/Borough?**

Table 18: Population by urban and rural areas in 2011 – East Sussex and District (Percentage)

	Urban	Rural
East Sussex	74	26
Eastbourne	100	0
Hastings	100	0
Lewes	77.1	22.9
Rother	47.7	52.3
Wealden	55	45

Source: Census 2011, East Sussex in Figures

b) **How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

Most respondents provided their postcode, meaning responses could be compared for those living in urban and rural areas.

Table 19: Rurality of consultation survey respondents compared to county census data

Rurality	HWRS consultation survey respondents, 2018		East Sussex population, 2011
	No. respondents	%	Percentage
Urban	1,514	45	74
Rural	1,402	41	26
Postcode not given	297	9	n/a
Outside East Sussex	172	5	n/a
<b>Total</b>	<b>3,385</b>	<b>100</b>	<b>100</b>

Urban areas are defined as being those forming or within settlements with a population of over 10,000. In this case, Eastbourne, Hastings, Bexhill, Seaford, Crowborough, Hailsham, Lewes, Uckfield, Newhaven, Saltdean and Peacehaven.

These urban areas have as at 2011 a total population of just over 383,000 – at that point, 73% of the total population of the County.

**c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

Proposal 1: Charge for certain non-household wastes at our sites

Those in rural areas would not be disproportionately affected by this change as charges would apply to all users of our sites who bring certain non-household waste types.

Proposal 2: Closure of Wadhurst and Forest Row sites

These two sites are in rural areas of the county and it is likely that the closure of these sites will mean those in the catchment area have further to travel to an alternative HWRS. This may mean that customers are likely to travel less frequently to an alternative site that is further away, or it may mean that they will incur additional fuel costs. However the impact will be less where people are able to link their visit to a recycling site with a trip for another purpose such as work or shopping.

It is possible that users do not necessarily visit their nearest site, there are other factors apart from travel time that influence decisions on which site to visit, and there may be a range of reasons behind this, including where people work, or combining a visit to the HWRS with a trip for another purpose, such as shopping, or visiting friends and family. It may therefore be that someone living in a rural location travels to a site in an urban setting and vice versa dependent on their patterns of travel.

The closure of these sites will impact a relatively small number of our current service users (our annualised visitor numbers indicate 5% of overall visits are to these sites), furthermore our analysis of journey times showed that many site-users within the catchment area for the Forest Row site would not need to travel more than an extra 10 minutes each way to an alternative site.

Proposal 3: Change opening hours at certain sites to better suit demand

A change to weekend opening hours at the Eastbourne site is likely to predominantly impact those in urban areas due to the location of the site being in a larger town, whereas the change at the Crowborough site is more likely to impact both urban and rural communities due to the catchment of this site extending to villages and hamlets surrounding Crowborough such as Mark Cross, Rotherfield, Mayfield, etc. The impact is expected to be minimal however, as the sites will continue to be open when there is most demand, and will include extended weekend opening hours as well as any reduction in weekday opening hours.

For those that live in rural areas in the catchment areas of any of the other sites who find the proposed changes to opening hours inconvenient whereby it is more difficult for them to access an alternative site, the impact may be that they use a site less often, and rely on other ways to dispose of their waste, such as kerbside collections.

**d) What is the proposal, project or service's impact on the factor or identified group?**

In terms of the proposals overall as a way to make savings, those respondents from rural areas were 11 percentage points more likely to find the proposals unacceptable compared to those from urban areas. This is not surprising as almost half of the respondents reported they use Forest Row or Wadhurst most often and it is likely to reflect general negative feelings about the site closures.

### Proposal 1: Charge for certain non-household wastes at our sites

There was a fairly even response to the consultation on this proposal between rural and urban residents of the county, at 71% and 70% finding the proposal acceptable respectively.

### Proposal 2: Closure of Wadhurst and Forest Row sites

There was a strong bias towards rural areas in terms of those that respondents that gave us their postcode and found the closure proposal widely unacceptable, 65% being against the proposal in rural areas and 43% in urban areas. It may be concluded that the response to the consultation over-represents residents in rural areas, particularly the catchment areas of the two sites proposed for closure.

### Proposal 3: Change opening hours at certain sites to better suit demand

In terms of the acceptability of the proposal to reduce site opening hours at quieter times of less demand, there was a fairly even response between rural and urban residents of the county, 17% and 18% finding the proposal unacceptable respectively.

Regarding the acceptability of keeping Eastbourne and Crowborough sites open for longer at the weekend and closing them at quieter times during the week, again there was a fairly even response between rural and urban residents of the county, with 70% and 72% finding the proposal acceptable respectively.

#### **e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

- The District and Borough Councils will continue to provide comprehensive kerbside recycling collections, which reduce the need to travel to recycling sites. The County Council will continue to help the Waste Collection Authorities (WCAs) promote their kerbside recycling collections and their local recycling points.
- The County Council will continue to promote other services on the Council website that reduce the need to travel to sites such as collections from the WCAs for kerbside garden waste, and bulky waste and home collections of reusable furniture by the charities.
- In order to help minimise the negative impact of potential site closures, the range of alternative provision available will be promoted at sites prior to the closures.
- The HWRS network of sites offered through the waste service, including the reuse shop will continue to be advertised via the County Council's website.

#### **f) Provide details of the mitigation.**

The potential impacts of the service changes are likely to be small. The current network of 12 sites and free disposal of non-household waste provides residents with a level of service that is higher than is legally required. It is considered that a network of ten HWRSs would provide the majority of the county with access to a site within reasonable travel time by vehicle

Crowborough is a potential alternative site for some of the residents in the catchment area of both Wadhurst and Forest Row sites. So the proposal to open Crowborough for longer at weekends would benefit those residents and help mitigate potential site closures, as well as benefiting those in the rural catchment area for the Crowborough site and helping to mitigate proposed reduced opening hours of that site in the week.

Prior to the closure of Forest Row and Wadhurst HWRS, we would advertise to users of these two sites the date of closure and their closest alternative site, through marketing at sites and on the County Council's website.

We would clearly advertise any changes to opening hours of the sites prior to the introduction of these changes, to ensure that all residents are informed. This would be done through marketing at sites as well as on the County Council's website.

We will continue to work with District and Borough councils to ensure that residents are well informed of the ranges of ways that they can dispose of their waste and will continue to promote on our website the alternatives to visiting a HWRS, including kerbside recycling, green waste kerbside collection, bulky waste kerbside collection and household waste collection.

Council waste team officers have engaged with Wadhurst and Forest Row Parish Councillors and District Councillors to investigate potential options for alternative services provided by the community or business sector. If the decision is made to close sites, it is recommended to Cabinet that this engagement continues, following the closure of these two sites by the County Council.

**g) How will any mitigation measures be monitored?**

We will continue to monitor the number of users at each of our sites, to compare the number of users before and after the changes have taken effect.

We will continue to monitor the responses to our customer satisfaction surveys and feedback from representative groups.

**4.10 Human rights** - Human rights place all public authorities under an obligation to treat service users with fairness, equality, dignity, respect and autonomy. **Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.**

We do not consider that the proposals have any impact on human rights.

<b>Articles</b>	
<b>A2</b>	<b>Right to life (e.g. pain relief, suicide prevention)</b>
<b>A3</b>	<b>Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances)</b>
<b>A4</b>	<b>Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults)</b>
<b>A5</b>	<b>Right to liberty and security (financial abuse)</b>
<b>A6 &amp; 7</b>	<b>Rights to a fair trial; and no punishment without law (e.g. staff tribunals)</b>
<b>A8</b>	<b>Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family)</b>
<b>A9</b>	<b>Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches)</b>
<b>A10</b>	<b>Freedom of expression (whistle-blowing policies)</b>
<b>A11</b>	<b>Freedom of assembly and association (e.g. recognition of trade unions)</b>
<b>A12</b>	<b>Right to marry and found a family (e.g. fertility, pregnancy)</b>
<b>Protocols</b>	
<b>P1.A1</b>	<b>Protection of property (service users property/belongings)</b>
<b>P1.A2</b>	<b>Right to education (e.g. access to learning, accessible information)</b>
<b>P1.A3</b>	<b>Right to free elections (Elected Members)</b>

## Part 5 – Conclusions and recommendations for decision makers

### 5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups.
- Foster good relations between people from different groups.
- The EqIA has informed the picture of need in the county and the impact of the proposals on different groups. ESCC considers that by delivering these proposals and with the general provisions of the HWRS Service as a whole, we are meeting our statutory duties under the Environmental Protection Act 1990 and the Equalities Act 2010.
- The proposals have been developed to avoid disproportionate impact on current users while helping to contribute to the required saving. The proposed changes to opening hours and the site closures do not alter the nature of the provisions of the HWRS Service.

### 5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

X	Outcome of impact assessment	Please explain your answer fully.
	<p><b>A No major change</b> – Your analysis demonstrates that the policy/strategy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.</p>	<p>Our proposals are based on a thorough service review which has outlined where and how the household waste recycling site service can best meet identified needs in the county, whilst continuing to meet the statutory duty to provide a reasonably accessible HWRS Service.</p>
	<p><b>B Adjust the policy/strategy</b> – This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.</p>	<p>A 12-week consultation has been undertaken and all comments and feedback received have been considered prior to finalising our proposals for Cabinet. We are confident that reasonable steps have been taken to ensure the protected groups have been considered among existing household waste recycling site customers and among those that completed the recent consultation questionnaire on our service change proposals, as well as the views of those that wrote to us during the period of public consultation.</p>
X	<p><b>C Continue the policy/strategy</b> - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate</p>	<p>This EqIA has identified the groups most likely to be disadvantaged or inconvenienced as a result of the proposals and has helped to identify a</p>
	<p><b>D Stop and remove the policy/strategy</b> – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed.</p>	

		<p>number of measures that could be put in place to reduce the negative impact of the proposals on these groups.</p> <p>We are satisfied that there is no unlawful discrimination as a result of the proposals and therefore no further changes are required as a result of this EqIA.</p>
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**5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?**

The waste team will undertake equality monitoring of the changes proposed through the customer satisfaction surveys by monitoring answers, as well as visitor numbers to the sites.

In addition, service complaints arising from the proposed changes will be kept under review at 3 monthly intervals for a period of 12 months. The results of complaints and customer satisfaction surveys will be used to monitor whether there is any evidence of adverse impact of the changes on service users.

**5.6 When will the amended proposal, proposal, project or service be reviewed?**

The proposed changes would be implemented by the end of 2018 and these changes would be reviewed one year after implementation of any service changes.

<b>Date completed:</b>		<b>Signed by (person completing)</b>	
		<b>Role of person completing</b>	
<b>Date:</b>		<b>Signed by (Manager)</b>	

**Part 6 – Equality impact assessment action plan**

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
4. **If no actions fill in separate summary sheet.**

**Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:**

Area for improvement	Changes proposed	Lead Manager	Timescale	Resource implications	Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT)

### 6.1 Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

Area of Risk	Type of Risk? (Legal, Moral, Financial)	Can this be addressed at a later date? (e.g. next financial year/through a business case)	Where flagged? (e.g. business plan/strategic plan/steering group/DMT)	Lead Manager	Date resolved (if applicable)