

## INTEGRATED IMPACT ASSESSMENT COVERING

- **EQUALITIES & SOCIO ECONOMIC DUTIES**
- **HUMAN RIGHTS AND RIGHTS OF THE CHILD**

### STAGE 1 - DO I NEED AN INTEGRATED IMPACT ASSESSMENT?

<b>Name of policy or proposal: Reduction of opening hours at HWRC</b>	
Is this a	Mark X below
New activity, programme or policy?	
Change to an existing activity, programme or policy?	X
Budget proposal?	

Duties: tick the boxes you think apply	No	Maybe	Yes
<b>Equalities:</b> Will your proposal have an impact on groups with protected characteristics?  <i>Consider the impact of your proposal on people and how they access your services and information without barriers.</i>		X	
<b>Socio-economic</b>  <i>Not every person/family has access to regular income or savings. Will your proposal have an adverse impact on them</i>		X	
Does your proposal impact on the <b>human rights</b> of people?	X		
Does your proposal impact on the <b>rights of children</b> and young people	X		

<p><b>Reasoning</b>                  Briefly describe your reasoning for the responses given above:                  Equalities;</p>
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Gender; Staff employed within the waste industry are predominantly men. Men could therefore be disproportionately affected by the changes. Equally, the changes may reduce the gender pay gap.

**Socio Economic:**

Any changes in opening hours could result in people choosing to use alternative methods (private companies/bulky service) for disposing of waste items as the HWRC are not available. This could result in additional financial burdens on households.

Commercial outlets that use the site for the disposal of their cardboard may be impacted due to availability to use the site outwith the trading hours of their business.

Any changes to opening hours could result in residents choosing to subscribe to the Council's garden waste collection to dispose of their garden waste. This could lead to an increased financial burden on households.

**If you have answered “maybe” or “yes” to any of the Stage 1 questions above then proceed to complete the Stage 2 Integrated Impact Assessment questions below.**

**If you have answered “no” to the Stage 1 questions above then provide the details below and submit to [email]**

Lead Officer for developing the contract	
Other people involved in the screening (this may be council staff, partners or others i.e. contractor or community)	
Date	

## STAGE 2: INTEGRATED IMPACT ASSESSMENT

### Brief description of the affected service

<p>1. Describe what the service does: The HWRC service provides a disposal point for households to dispose of waste items which either will not fit in a wheeled bin, or, are unsuitable for being put in a wheeled bin.</p>
<p>2. Who are your main stakeholders? The main stakeholders are: Members of the public Commercial customers (for excess recycling material only) Moray Staff</p>
<p>3. What changes as a result of the proposals? Is the service reduced or removed? Whilst the decision is still to be made on what changes are to be made, the common factor in all the options being considered are that there would be a reduction in the opening hours. Therefore there would be a reduction in the availability for the public/commercial customers to use the HWRC's.</p>
<p>4. How will this affect your customers? The impact would be that the availability for customers to use the site to dispose of their waste would be reduced. This could impact on customers in a number of ways-financially from using other disposal methods or travelling greater distances to use a site, inability to dispose of waste so creates a build-up of waste, commercial customers not being able to access the site during non-business hours so not using their permit allowance, or creating a build-up of waste.</p>
<p>5. Impact on staff providing the service Dependant on what changes were made would affect the impact on staff providing the service. The impacts could be a reduction in overtime or enhanced working hours, potential changes to core contracts or potential restricting of working week.</p>

6. Please indicate if these apply to any of the protected characteristics	
Protected groups	Potential impacts and considerations
Race	
Disability	
Carers (for elderly, disabled or minors)	
Sex	Staff employed within the waste industry are predominantly men. Men would therefore be disproportionately affected by any changes.
Pregnancy and maternity (including breastfeeding)	
Sexual orientation	

Age (include children, young people, midlife and older people)	
Religion, and or belief	
Gender reassignment	
Inequalities arising from socio-economic differences	<p>Any changes in opening hours could result in people having to use alternative methods (private companies/bulky service) for disposing of waste items as the HWRC are not available. This could result in additional financial burdens on households.</p> <p>Commercial outlets that use the site for the disposal of their cardboard may be impacted due to availability to use the site out with the trading hours of their business. This may create an impact on their business in terms of waste storage or increased waste disposal costs.</p> <p>Any changes to opening hours could result in residents needing to subscribe to the Councils garden waste collection to dispose of their garden waste. This could lead to an increased financial burden on households.</p>

### Human rights

List of convention rights	Describe, where applicable, if and how specific rights are engaged
Article 5: Right to liberty and security	
Article 6: Right to a fair trial	
Article 8: Right to respect for private and family life, correspondence and the home	
<i>Article 10: Freedom of expression</i>	
<i>Article 11: Freedom of assembly and association</i>	
<i>Article 12: Right to marry</i>	
<i>Article 14: Prohibition of discrimination (in relation to the convention rights)</i>	
<i>Article 1 of Protocol 1: Protection of property</i>	
<i>Article 2 of Protocol 1: Right to education</i>	

List of convention rights	Describe, where applicable, if and how specific rights are engaged
Article 3 of Protocol 1: Right to free elections by secret ballot	

### Children's Rights and Wellbeing

Relevant articles – UNCRC	
Article 2 – Non discrimination	
Article 12 – Respect of the views of the child	
Article 3.1 – Best interest of the child	
Article 6.2 – Right to survival and development	

### 7. Evidence. What information have you used to make your assessment?

<b>Performance data</b>	Review of data on site usage will be a contributing factor with regards the decision making process.
<b>Internal consultation</b>	Waste Management Team Head of Service Members
<b>Consultation with affected groups</b>	
<b>Local statistics</b>	
<b>National statistics</b>	
<b>Other</b>	Analysis of the employee profile shows the workforce is predominantly male. Review of previous changes made to opening times of HWRC sites.

### 8. Evidence gaps

<p>Do you need additional information in order to complete the information in the previous questions?</p> <p>There is no data available on how people with protected characteristics use the HWRC's in order to fully determine how they would be affected by any changes.</p> <p>There is also limited data available on the usage of all HWRC sites with only Chanonry HWRC in Elgin having a formal booking system in place. However, this data only shows trends in usage and does not show any information regarding protected characteristics.</p> <p>There is no data available on the socio economic factors with regards the usage of HWRC sites.</p>
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The change proposed will be part of a public consultation as stage 2 of the Public Communication and Engagement Strategy

## 9. Mitigating action

*Can the impact of the proposed policy/activity be mitigated?* Please explain

The mitigation to address the negative impacts include the provision are:

- 1) A bulky waste service will be available for residents to use dispose of their waste items
- 2) A kerbside garden waste collection service is available for residents to use to dispose of their garden waste
- 3) The HWRC's will be open on different days within the week.
- 4) Residents can request bigger / additional recycling bins at their house if they have excess volumes of recycle.

It is noted that the first and second mitigation measures are also highlighted as an impact within this assessment.

It is noted that some of mitigation identified will be affected by other service changes being considered. Specifically, the increase in subscription fees for the garden waste service which may impact on the ability for residents to take up the mitigation which has been outlined.

Requests for bigger / additional recycling bins will have an impact on the area of the service that delivers bins as well as potential budgetary implications and this must therefore be managed carefully.

## 10. Justification

If nothing can be done to reduce the negative impact(s) but the proposed policy/activity must go ahead, what justification is there to continue with the change?

Under Section 1 of the Refuse Disposal (Amenity) Act 1978, the council has a statutory duty to provide facilities at which residents of the area may deposit their household waste for disposal. Sites are required to be accessible and available at reasonable times, including one day at a weekend. Any changes would still comply with the legislative requirements.

Sites will still be available for customers to use albeit with changed opening hours. There are a number appropriate mitigation options for residents to choose from to address any negative impact.

There will be no redundancy implications from these changes so staff will still be retained in their substantive roles. Though it is noted that revised working rotas could impact on staff and their work/life balance.

All sites currently operate on a limited hours basis at the moment, particularly over a weekend. Dallachy HWRC site already closes on a Sunday so there is a precedent in place that this system can operate successfully.

### SECTION 3 CONCLUDING THE IIA

#### Concluding the IIA

1. No potential negative impacts on any of the protected groups were found.	
2. Some potential negative impacts have been identified. The impacts relate to:	
<ul style="list-style-type: none"> <li>• Protected characteristics under the Equalities Act</li> <li>• Socio Economic impact and inequality</li> <li>• Human rights/rights of the Child</li> </ul>	X X
Reducing discrimination, harassment, victimisation or other conduct prohibited under the Equality Act 2010	
Promoting equality of opportunity	
Fostering good relations	
3. The proposals interfere with human rights and/or the rights of the child	
4. Negative impacts can be mitigated the proposals as outlined in question 8	
5. The negative impacts cannot be fully mitigated but are justified as outlined in question 9.	X
6. Further consultation with affected groups is needed.	
7. It is advised not to go ahead with the proposals.	

**Decision**

Set out the rationale for deciding whether or not to proceed with the proposed actions:

**Date of Decision:** 12.10.23 RG in absence of NM

**Sign off and authorisation:**

<b>Service</b>	
<b>Department</b>	
<b>Policy/activity subject to IIA</b>	
We have completed the integrated impact assessment for this policy/activity.	Name: Paul Wolverson Position: Service Manager Date: 22 September 2023
Authorisation by head of service	Name: Nicola Moss Position: Head of Environmental & Commercial Services Date: 29 September 2023
Permission to publish on website -	
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	