

INTEGRATED IMPACT ASSESSMENT COVERING

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

STAGE 1 - DO I NEED AN INTEGRATED IMPACT ASSESSMENT?

Name of policy or proposal: Increase subscription charge for garden waste service to £50	
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
Equalities: 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		
Socio-economic <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 human rights of people?	X		
Does your proposal impact on the rights of children and young people	X		

<p>Reasoning Briefly describe your reasoning for the responses given above: Socio Economic: Any changes to subscription fee could create a financial burden on households.</p>

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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	Paul Wolverson
Other people involved in the screening (this may be council staff, partners or others i.e. contractor or community)	Paul Wolverson, Mike Neary, Nicola Moss
Date	

STAGE 2: INTEGRATED IMPACT ASSESSMENT

Brief description of the affected service

<p>1. Describe what the service does: The garden waste service is a kerbside collection service for household to use to dispose of their garden waste. The service is optional and is based on residents opting in and paying an annual subscription charge.</p>
<p>2. Who are your main stakeholders? The main stakeholders are: Members of the public Moray Staff</p>
<p>3. What changes as a result of the proposals? Is the service reduced or removed? There will be no changes to service provision. The only change relates to the annual subscription fee.</p>
<p>4. How will this affect your customers? The impact would be that garden service would cost more to subscribe to. This would potentially create an additional financial burden to residents.</p>
<p>5. Impact on staff providing the service The impact on staffing could be a reduction in subscriptions numbers which may 1) reduce the amounts collected through the kerbside collection, or 2) increase the amounts collected at HWRC's sites, if residents chose to dispose of their garden waste in an alternative way. If payments by instalments is offered as part of any mitigation this could increase the number of calls received by the Contact Centre and thereby increase their workload.</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	
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	Any changes to the subscription fee could result in people having to use alternative methods (private companies/HWRC) for disposing of their garden waste. This could result in additional financial burdens on households.
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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>	
<i>Article 3 of Protocol 1: Right to free elections by secret ballot</i>	

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?

Performance data	
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Internal consultation	Waste Management Team Head of Service Members
Consultation with affected groups	Resident budget consultation exercise included a question regarding increasing garden waste charges. Although Household Garden Waste Permits has the least 'appetite' for increase, almost 60% of participants showed willingness for some increase.
Local statistics	
National statistics	
Other	Review subscription fees of other local authorities to ensure there is comparability in charges.

8. Evidence gaps

Do you need additional information in order to complete the information in the previous questions?
 There is no data available regarding people with protected characteristics and their:

- 1) Subscription levels to the garden waste scheme
- 2) Usage of the HWRC's to dispose of their garden waste

9. Mitigating action

Can the impact of the proposed policy/activity be mitigated? Please explain
 The mitigation to address the negative impacts includes:

- 1) Residents can dispose of their garden waste free of charge at HWRC sites
- 2) The subscription fee will be comparable with other local authorities charges
- 3) There is no requirement to use the service for disposal of garden waste – home composting is also a viable option
- 4) An option to pay the subscription fee in two instalments can be offered to residents to ease any financial burden. This will be in place for the 2024/25 season. Work can be undertaken in 2024/25 to establish the feasibility of offering payments over an increased under of instalments for future years.

It is noted that some of mitigation identified could be affected by, or may impact on, other service changes which may be being considered as part of the budget savings proposals. For example, any changes with regards opening hours of HWRC sites which may reduce the availability of the mitigation which has been outlined, or, increased demand on the Contact Centre through increased phone contact.

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?

There is justification to continue with the proposal on the basis of:

- 1) The provision of a kerbside garden waste service is not a statutory service.
- 2) The cost of service delivery increases year on year
- 3) The Council reduced its charges for 2023/24. This reduction has not resulted in an increase in subscription with this number remaining stable from the previous year. This suggests that even when the subscription fee is higher than its current level that the service is still seen as value for money.
- 4) HWRC sites are available if resident want to dispose of their garden waste through that method

Can you demonstrate that the proposals are still proportionate in a wider sense?

The proposals are still proportionate on the basis that a chargeable garden waste subscription service is now the norm throughout the majority of the UK, there was no increase in the subscription fee in 2023/24 so the current fee is already lower than previous levels and there are alternative disposal options available for residents.

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"> • Protected characteristics under the Equalities Act • Socio Economic impact and inequality • Human rights/rights of the Child 	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:

11.10.23 RG in absence of NM

Sign off and authorisation:

Service	
Department	
Policy/activity subject to IIA	
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.	