

Equality Analysis - proposed changes to Household Waste Recycling Centre operational practices and procedures

Cheshire West and Chester Council (CW&C) is the waste collection and disposal authority responsible for the management of municipal waste. This includes the collection, treatment, and disposal of municipal waste from all residential households, Household Waste Recycling Centres (HWRC) and street cleansing waste.

HW Martin (HWM) operates seven Household waste sites on behalf of CW&C. The contract ends in March 2026, and from April 2026, the sites will be operated by a Council owned company Cheshire West Recycling Ltd. There are three primary sites (Winsford, Ellesmere Port and Chester) and four secondary sites (Neston, Frodsham, Tattenhall and Northwich). The larger primary sites accept a larger range of materials than the secondary sites due to site restriction. The sites offer an outlet for residents of Cheshire West to recycle and dispose of a range of materials; each year ca. 40,000 tonnes of household waste and recycling transfers through the sites. The three primary sites host re-use shops allowing residents to purchase re-usable items at low cost. As a waste disposal authority (WDA) CW&C is obliged to provide HWRCs for residents to dispose of their household waste free of charge under Sections 51(1) and 51(2) of the Environmental Protection Act 1990 (EPA).

In summer 2021 the Council published its new ten-year waste strategy. The strategy committed to undertaking a review of the HWRC provision ahead of the re-commissioning of the service with a view to optimising the value of the service by reducing waste we cannot recycle and diverting more waste for re-use and recycling.

In promoting the principle of “informing-engaging-consulting” by the Council, key stakeholders and the public were invited to provide their views during a public consultation around a range of measures proposed to help the council achieve its ambitions to become a carbon neutral council by 2030. The outputs from the consultation have been considered in the development of the final service design, and helped to identify additional impacts that have been considered as part of the Equality Analysis below.

This Equality Analysis (EA) is a working document and will be updated after the close of the Public Consultation, and presented as part of the decision-making process that will determine the future service design.

Research

Population: [Population Estimates | Cheshire West and Chester Council](#)

IMD: [index of multiple deprivation 2019 cwac infographic 2019-10-21 \(cheshirewestandchester.gov.uk\)](#)

Digital vulnerability indicators: [CACI Digital Vulnerability Indicators \(June 2022\) \(cheshirewestandchester.gov.uk\)](#)

Car ownership: [Transport and connectivity | Cheshire West and Chester Council](#)

(PDF) HWRC booking systems and incidents of fly-tipping -research into possible links (Technical Report for Defra) ([researchgate.net](#))

HWRC and charging for DIY waste consultation: [Summary of responses and government response - GOV.UK \(www.gov.uk\)](#)

<https://wrap.org.uk/sites/default/files/2021-09/fly-tipping-rates-and-HWRC-charging.pdf>

Proposed Changes to the Household Waste and Recycling Service

The Council has developed three **key ambitions** to ensure we deliver a modernised and affordable HWRC service and five possible solutions to help us achieve these ambitions.

The three **ambitions** are:

1. Prevent waste by re-using and recycling products and materials at every opportunity
2. Provide fair and reasonable access for residents, while preventing unauthorised access
3. Continue to improve the service and make it as efficient as possible.

The five **proposed solutions** to help deliver these ambitions are:

1. Provide more opportunities for the repair and reuse of unwanted items
2. Automate proof of address checks by pre-registering vehicles
3. Update the HWRC Reasonable Usage Policy
4. Support residents to sort the waste and recycling they bring to HWRCs

5. Limit the amount of DIY waste brought without charge.

Key stakeholders (Please note this is not an exhaustive list):

- The public (Borough Residents)
- HWM employees
- Respondents from Play Your Part public consultation (those who agreed to be contacted about other consultations)
- Council staff including key internal department such as Street Care & Regulatory Services
- HWRC Scrutiny Task group
- CW&C Executive Members
- CW&C Ward Members
- District advisory panels: Chester, EP, Northwich, Winsford and Rural
- Town and Parish Councils
- Current kerbside service provider (Cheshire West Recycling)
- Partner organisations
- Neighbouring authorities
- Other interest groups (including disability groups, older people's groups, Youth Senate etc)
- Relevant service areas with the Council
- Third party charities
- Social media community groups
- Social landlords
- QWEST staff
- Media via news stories.

Commentary included below is an overview of impact on residents if the solutions were implemented. A detailed Communications Plan has been developed to extensively promote the changes to stakeholders before any changes were implemented.

Overall the EA has a positive impact on residents by providing the following opportunities:

- The pre-registration system will enable friends, families and carers to bring waste to the sites for vulnerable residents, without the need to bring the resident with them. This is an important improvement to existing procedures as some residents may be too unwell to attend in person.
- By preventing unauthorised use of the sites and removing the need for physical ID checks at the entrance, site staff will be available to offer more help to residents with physical impairments or residents who may need more help to understand the service requirements, such as those with language barriers or vulnerabilities.
- Expansion of reuse activities will provide greater opportunity to work with charities and community groups offering support to people living with mental health, physical and financial challenges, as well as providing free and low cost items at the re-use shops.
- The pre-registration system is simple to use and accessible to all, carried out online or through completion of a paper form that can be collected and returned to the recycling centre when residents visit.

For each of the areas below, an assessment needs to be made on whether the policy has a positive, negative or neutral impact, and brief details of why this decision was made and notes of any mitigation should be included. Where the impact is negative, this needs to be given a high, medium or low assessment. It is important to rate the impact of the policy based on the current situation (i.e., disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g., an area that is very much legislation led and where the Council has very little discretion

Target group / area	Neutral	Positive	Negative
Race and ethnicity (including Gypsies and Travellers, refugees, asylum seekers etc.)	<p>Gypsies and Travellers can only currently visit HWRCs if they have a permanent address within the council area. This is still the case if a pre-registration system is introduced so there is no further negative impact. Travellers passing through the borough will not be able to use the facilities. Where appropriate, waste collection is provided to travelling communities, arranged through the Gypsy Traveller liaison team.</p> <p>There is no other impact identified at this time due to race and ethnicity.</p>	<p>There is potential to collect information (optional) through the pre-registration process regarding the preferred language of the registered users. This could help us to identify ways of overcoming language barriers and provide key information about the services in other languages.</p>	<p>Language barriers mean that residents who do not speak English as their main language may be less aware of any changes to HWRCs, should the solutions be adopted. For standard vehicles (non-commercial), there will be a soft launch to help provide adequate time for residents to pre-register. Meaning residents that are unaware of the changes and fail to register their vehicles are still allowed to access the sites on that occasion and signposted to the registration process.</p> <p>Consideration should be given to providing hard copy registration forms in other widely spoken languages that can be given out on-site.</p> <p>LOW after mitigations</p>

<p>Disability</p> <p>(as defined by the Equality Act - a physical or mental impairment that has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities)</p>		<p>Some solutions are designed to prevent unauthorised users from bringing waste to the sites. This should result in less visitors overall, and free up site staff to support residents with a disability. There may also be a reduction in queuing at the busier sites, where queuing for long periods may negatively impact on disabled people.</p> <p>The drive to recover more useable items for re-use will mean that the site operator can work with charities and social care to re-distribute medical aids that are often discarded at the sites.</p> <p>An increase in focus around increasing the amount of waste we re-use should result in the service provider working with more community groups and charities, which in turn may</p>	<p>Disabled people may find it difficult to complete the information needed to register their vehicles. Therefore, the pre-registration form will be compliant with accessibility standards.</p> <p>On HWRC sites, members of the public will be signposted to large print versions of the registration form. Hard copies in accessible format will be available on site and in council libraries. The online registration form will be built to meet accessibility standards. Support will be offered to help people register through the libraries and contact centre. Residents may have some difficulty bringing their waste pre-sorted or may find sorting their waste on request more challenging. Site staff will help where requested and clear and simple signage will be available to assist the to use the right waste containers.</p>
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		<p>include or support disabled members.</p> <p>Helper's passes will be available for friends and family to help vulnerable or unwell people use the sites (without the need for them to attend themselves, which is an improvement to current processes where residents must accompany their helpers).</p>	<p>Commercial vehicles that have be adapted for disability purposes will be allowed to access the sites under the same terms as a standard (non-commercial vehicle).</p> <p>For standard (non-commercial) vehicles, the registration form will be designed to request the minimum amount of information needed to ensure the solution remains effective as a control measure in preventing unauthorised waste or persons entering the sites.</p> <p>LOW after mitigations</p>
Sex (male or female)	Any impact would be expected to be neutral on this characteristic.		
Gender identity (gender reassignment)	Any impact would be expected to be neutral on this characteristic. Registration forms developed will not need to		

	use pronouns related to identity descriptions (name and address only is required)		
Religion and belief (including lack of belief)	Any impact would be expected to be neutral on this characteristic.		
Sexual orientation (including heterosexual, lesbian, gay, bisexual and others)	Any impact would be expected to be neutral on this characteristic. The pre-registration will ask for the names of other adults living with them that require access to the HWRC sites. The relationship status of these adults is not required.		
Age (children and young people aged 0 – 24, adults 25 – 50, younger older people 51 – 75/80; older older people 81+. Age bands are for illustration only as overriding consideration should be given to needs)		<p>Positively impact upon more elderly customers. The proposed policies would seek to improve waiting times at HWRCs.</p> <p>A combination of solutions proposed can have a positive impact as operatives have more time to support those who need it</p>	<p>It is proposed that the payment system relating to the proposal to charge for large amounts of DIY waste is cashless to reduce the risk of fraud and theft from sites.</p> <p>This may affect some residents who may prefer cash transactions but does ultimately protect both customers and site staff from any wrongdoings. Further</p>

		<p>and make it less stressful experience.</p> <p>We recognise that some elderly people may feel isolated and want to attend the HWRCs regularly as part of their routine. We will actively promote visits and events at our Re-Use shops on sites to facilitate this (and for which no booking is required).</p> <p>The pre-registration system removes the need to remember to bring proof of address when visiting sites, making access simpler.</p> <p>Residents in the oldest age bracket are less likely to drive a vehicle. The pre-registration system will link any vehicle they own to the address so the driver at the time of visit does not need to be the registered keeper. Residents could also register vehicles of carers or</p>	<p>consideration should be given to the possibility of introducing cash transactions at the Primary sites once the Re-use shops are developed to provide a formal “till system”.</p> <p>It will be necessary to communicate the changes widely ahead of implementing any changes. This will be done through a minimum three-month campaign, with information provided on the sites in advance of the changes, in libraries and via social media. Every site user will be made aware of the requirements during the registration process.</p> <p>For standard vehicles (non-commercial), there will be a soft launch to help provide adequate time for residents to pre-register. Meaning residents that are unaware of the changes and fail to</p>
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		<p>family members through a helper's pass (that are not already registered). This means they will no longer have to accompany their "helpers" to the recycling centre.</p>	<p>register their vehicles are still allowed to access the sites on that occasion and signposted to the registration process. Forms can be issued and returned on site to help elderly residents who do not access online platforms.</p> <p>For standard (non-commercial) vehicles, the registration form will be designed to request the minimum amount of information needed to ensure the solution remains effective as a control measure in preventing unauthorised waste or persons entering the sites.</p> <p>LOW after mitigation</p>
<p>Care Experienced (all young people and adults who have been in the care of Cheshire West and Chester Council - for a period of 13 weeks or</p>		<p>In the process of recovering more items for re-use, there will be a wider range of household and personal items available at low cost to be redistributed through</p>	<p>No negative impacts have been identified for this characteristic.</p>

more - from the age of 14 years. This includes those children/young people for whom the Council currently or have previously held corporate parenting responsibilities)		the HWRC reuse shops which could help support care leavers to furnish independent accommodation. The Council intend to require any future service provider to work with organisations supporting care leavers as part of their social responsibility.	
Carers (people who care for others, informally or formally)		The Council will be able to signpost carers to the application process for additional waste capacity due to medical needs. This could be more convenient for them than making journeys to the HWRCs on a regular basis.	<p>The pre-registration system could have the option for friends or family members to identify themselves if they are using the HWRC sites to bring waste produced from someone they care for. This will help us to work with them if they require extra visits through their caring responsibilities to ensure they have the access they need.</p> <p>LOW after mitigation.</p>

Rural communities	<p>Proposals being consulted on all comply with general guidance on acceptable levels of provision for our population numbers and acceptable distance to travel to a household waste recycling centre.</p> <p>We would encourage residents to combine their trips to the HWRC with other journeys, visiting when they are passing sites for another reason rather than making a specific trip.</p>	<p>These proposals seek to provide the best possible value for customers and save on unnecessary costs, which helps support and protect the HWRC provision so far as possible.</p>	<p>No negative impacts have been identified for this characteristic.</p>
Areas of deprivation (include any impact on people living in poverty who may not live in areas identified as deprived)		<p>Improved reuse facilities at will allow good quality, low priced goods to be made available to the general public for purchase, helping those on low incomes, or those looking for a bargain. This may also help reduce the need for new goods and the environmental impact associated with their production and manufacture.</p> <p>The pre-registration system is adaptable. As such we</p>	<p>In line with a new law introduced by Central Government in December 2023, any new charges for DIY could put additional pressures on low-income families. Any charges will be reasonable. No discount offered for low-income homes, but small volumes will continue to be accepted without charge under the new law. The charge will be based on full cost recovery to cover handling and disposal costs of waste defined as industrial/construction waste.</p>

		<p>can ensure that residents without their own vehicles can still access the sites using a vehicle driven by a friend, family or neighbour, providing this is not being done for commercial gain by the driver.</p>	<p>The option to charge residents for amounts that exceed the government limits provide a value for money option in comparison to a private skip, especially if those amounts are less than a full skip. A higher proportion of low-income families live in rented accommodation and unlikely to be undertaking larger scale DIY projects themselves where charges could apply. These proposals aim to ensure only larger amounts of DIY waste become chargeable and is based on government legislation that has undertaken full national consultation.</p> <p>Low after mitigation</p>
<p>Human rights (see guidance note for key areas to consider)</p>	<p>Any impact would be expected to be neutral on this characteristic.</p> <p>All data retained as part of the registration process will be held in accordance with GDPR regulations / Council</p>		

	<p>policies and a DPIA (Data Protection Impact Assessment) will be carried out should a pre-registration system be implemented.</p>		
<p>Health and wellbeing and Health Inequalities (consider the wider determinants of health such as education, housing, employment, environment, crime and transport, plus impacts on lifestyles and effects on health and care services)</p>	<p>Research carried out by the Waste Resource Action Programme concluded that there was no evidence to suggest that charging for the deposit of DIY waste at HWRCs led to an increase in fly tipping.</p>	<p>Future of provision of on-site re-use outlets provides opportunities for volunteering through partner charities. Through community benefit obligations, bidders will set out plans for apprentices/ training and work with the council to proactively promote working in the waste sector</p> <p>The Government Research conducted on the impact of similar systems to a pre-registration system has identified that site staff experience less conflict on site between customers and site staff. This is partly because site users are aware their details are held, but also those people currently abusing the sites, such as traders can no longer access the sites.</p>	<p>We recognise that some new conflict could be introduced through the DIY waste charging proposal, especially when determining quantities to be charged. However, site staff will receive additional training and the charging proposal has been kept as simple as possible with one charge per additional item or bag, irrespective of material. We have removed the requirement to pay for wood and metal DIY waste products which can be difficult to price because of the shape and size.</p> <p>LOW after mitigation</p>

		<p>It is possible that residents making regular trips to the HWRCs may be doing so because they are unaware of council services available to help manage their waste at home through the council waste and recycling kerbside provision. These policies can be promoted through signage at the sorting stations at the HWRCs and all staff will be aware of the policies and services to signpost residents. They include the assisted collection service, and policy around provision of additional capacity for large families or people producing more waste because of a medical condition.</p>	
<p>Procurement/partnership (if project due to be carried out by contractors/partners etc, identify steps taken to</p>		<p>The service delivery partner post 2026 will be Cheshire West Recycling Ltd, a Council owned company.</p>	

ensure equality compliance)		<p>There is an opportunity through the re-commissioning process to ensure Social Value is a key area of the procurement process – encouraging wider engagement with community and third sector organisations working in the repair and reuse sectors.</p> <p>Should the proposals be implemented, some may be carried out before the end of the new contract in partnership with the current service provider. This EA will be updated at various points during implementation to ensure equality compliance. The pre-registration system enables us to capture data on protected characteristics (should the customer wish to share it). Satisfaction surveys will also be carried out post implementation to</p>	
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		ensure any issues arising are managed.	
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Evidence (see guidance note for details of what to include here):

This section will be updated post consultation.

Action plan

In addition to the mitigations outlined in the table above, the following actions will be required:

Actions required	Priority	Outcomes required	Officer responsible	Review date
<p>Ensure that engagement activity is inclusive and is undertaken with the diverse communities.</p> <p>Provide opportunity of consultation documents provision in alternative format such as easy read, hard copies and other languages. Clear and concise communications in Plain English. Availability in libraries, HWRCs.</p>	High	<p>Understanding of possible issues affecting diverse communities (particularly disabled residents and older residents). To effectively engage with a cross section of ages of adults within the consultation.</p> <p>Workshops to Community Groups</p>	Waste Strategy Manager supported by I & I HWRC consultation working group	Completed
Use engagement feedback to establish whether there could be any adverse impact on any group -	High	Equity in service provision for all the borough's communities	Waste Strategy Manager supported by I & I HWRC	Completed

Address any identified issues affecting minority groups			consultation working group	
Ensure pre-registration form is compliant with accessibility requirements - Accessibility Audit to be undertaken if solution adopted by Digital Accessibility Team	Med	Ensure alternative formats are available including Easy Read; helpline number provided; Plain English applied to materials published.	Corporate Comms/ Digital Accessibility Team	TBC post decision on solutions
Undertake a DPIA on any new systems required including payment system and the pre-registration system at various stages of procurement /development they be adopted		To ensure all personal data is protected in accordance with GDPR and Council Policy, and contractor compliance where applicable.	Waste Strategy Manager Software/ Service providers if applicable	TBC post decision on solutions
Review this document after all solutions have been implemented		To ensure any impacts are identified and mitigated	Waste Strategy Manager	TBC post implementation of solutions

Sign off	
Lead officer:	Tara Dumas
Approved by Tier 4 Manager:	Mark Brazil

Moderation and/or Scrutiny The EA was taken to CDAF during development	
Date: Updated 12 May 2025, post consultation	Moderation group 10 June 2025
Date analysis to be reviewed based on rating (high impact – review in one year, medium impact - review in two years, low impact in three years)	LOW impact due to mitigations on Solutions