
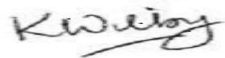


**Integrated Impact Assessment (IIA) (including equality, environment, health, human rights, socio-economic Duty, United Nations Conventions the Rights of the Child and Welsh language**

<b>Name of Policy or Practice</b>	Waste and Recycling Collections on Unadopted Roads		
<b>Responsible Officer</b> (responsible for the Policy or Practice)	Katie Wilby		
<b>Service / Portfolio</b>	Streetscene and Transportation	<b>Start Date of Assessment</b>	09/11/2023

<b>Name of officer(s) (and partners) completing the IIA</b>		
<b>Name(s)</b>	<b>Job Title(s)</b>	<b>Signature(s)</b>
Christopher Goddard	Streetscene Service Manager	
Katie Wilby	Chief Officer Streetscene and Transportation	

\*Consider including only job titles when publishing

<b>Document Version</b>	<b>Revision Date</b>	<b>Briefly Describe the Changes</b>
V1		New policy

<b>IIA Approved by Responsible Officer / Portfolio / Service / Committee</b>	
<b>Date IIA Concluded</b>	
<b>Name</b>	
<b>Job Title</b>	
<b>Signature</b>	

## Introduction

This document is a multi-purpose tool ensuring the appropriate steps are taken to comply with the [Public Sector Equality Duty \(PSED\)](#) Equality Impact Assessment legislation and to demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the [Socio-economic Duty](#). It also incorporates [Welsh Language impacts](#), environmental and bio-diversity impacts, health impacts and United Nations Conventions Rights of a Child.

When we plan to introduce a new, or revise an existing, policy, strategy or practice, develop a new service, make changes or cuts to a service or make strategic decisions, we are required to consider if the decision would have a disproportionate impact on people sharing one or more [protected characteristic](#) or whether it could create inequalities of outcome around socio-economic disadvantage. Where this is likely to be the case, we must take appropriate action. The IIA process is not intended to prevent us doing things but to ensure we have considered the impact. It helps us focus on the actions we can take to remove and/or mitigate any disproportionate or discriminatory impact and introduce measures to advance equality of opportunity.

To comply with the PSED [General Duty](#) and [Socio-economic Duty](#), we must have 'due regard' (or consciously consider the need) to: eliminate discrimination, advance equality of opportunity and foster good relations and to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage. The greater the relevance and potential impact, the higher the regard required by the duty. The General Duty will be more relevant to some functions than others and they may also be more relevant to some protected characteristics than others. Our duty must be exercised with rigour, an open mind and considered at a time when it can make a difference to our decisions. Policies with high relevance, such as strategic budgetary decisions, grant-making programmes, changes to service delivery (including withdrawal or reorganisation of services), and recruitment or pay policies should always be subject to an assessment for impact. For further guidance see [EHRC Assessing Impact Guidance](#). Our duty to comply with this legislation cannot be delegated.

This form should demonstrate the steps taken to carry out the assessment including relevant engagement/consultation, the information taken into account, the results of the assessment and any decisions taken in relation to those results. The IIA should be published where it shows a substantial (or likely) impact on our ability to meet the PSED.

### Benefits of undertaking an IIA:

- Gain a better understanding of those who may be impacted by the policy or practice
- Better meet differing needs and become more accessible and inclusive
- Enable planning for success – identifies potential pitfalls and unintended consequences before any damage is done
- Enable improved planning that will make decisions proactive rather than reactive, avoid having to reverse decisions which could have cost and reputational implications
- Demonstrate decisions are thought through and have taken into account the views of those affected
- Enable us to manage expectations by explaining the limitations within which we are working (e.g. budget)

- Help avoid risks and improve outcomes for individuals
- Remove inappropriate or harmful practices and eliminate institutional discrimination
- Ensure we put Welsh and English Language on an equal footing. and that decisions are made that safeguard and promote the use of the Welsh language
- Improve and protect health, maximising health benefits and reducing health risks
- Be more open and transparent
- Use our resources more effectively

Whilst this document may seem lengthy, as well as containing the necessary steps in the process, it also contains guidance notes in the key areas to assist you in undertaking the IIA. Additional links to further information are also included for assistance. Further information can be found on NHS/ WLGA PSED/ EIA [here](#).

The Welsh Government<sup>1</sup> guidance states that:

Impact assessment prompts and guides us to gather, and if necessary, seek evidence so as to improve the development of a policy or delivery plan, or inform a change of direction in policy or delivery. It is a methodology to help in the development and implementation of policy, rather than templates with tick boxes and checklists.

## **Integrated Impact Assessment Steps**

- Step 1 - Identify the Main Aims and Objectives of the Policy or Practice
- Step 2 - Data, Engagement and Assessing the Impact
- Step 3 - Procurement and Partnerships
- Step 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice
- Step 5 - Decision to Proceed
- Step 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data
- Step 7 - Publishing the Integrated Impact Assessment

## **Important Note to Completing Officer(s):**

It is important that the IIA is completed when the policy or practice is being developed so that the findings from the IIA can be used to influence and shape the policy or practice. It is recommended as a minimum, it is completed by a lead officer who is responsible for the policy or practice, a subject matter expert and a critical friend with at least one who has received formal IIA training. This document needs to be presented to the decision makers along with the draft policy or practice as part of the decision making process.

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<sup>1</sup> Welsh Government Integrated Impact Assessment Guidance

Where you are developing a high level strategy or plan that does not contain sufficient detail to show how it will impact on individuals or groups (i.e. where there will be plans and actions sitting beneath the strategy that will determine this), you should still undertake the Impact Assessment. You may also need to complete additional IIA(s) on the plans and actions beneath the high level strategy. This will ensure you demonstrate that you have shown due regard to complying with the General Duty, the Public Sector Equality Duty, the Welsh Language Standards the Socio-economic Duty, the Human Rights Act, the United Nations Conventions, Rights of the Child.

If your policy or practice is as a result of a UK, Welsh Government or Local Authority wide directive, you should still assess the impact of this locally to identify any differential impact due to local difference.

You should consider whether other events, e.g. COVID-19, Brexit, Black Lives Matter, etc. have highlighted or exacerbated inequalities that need to be addressed as you work through the IIA.

## STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

### 1. What is being assessed? *(Please double click on the relevant box(es) (X) and select 'checked' as appropriate)*

- New and revised policies, practices or procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff, e.g. early years provision, care, education
- Efficiency or saving proposals, e.g., resulting in a change in community facilities, activities, support or employment opportunities.
- Setting budget allocations for new financial year and strategic financial planning
- Decisions affecting service users, employees or the wider community including (de)commissioning or revised services.
- New project proposals affecting staff, communities or accessibility to the built environment, e.g. new construction work or adaptations to existing buildings, moving to on-line services, self-service, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation (refer to any national IIA and consider local impact)
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Service Boards which impact on a public body functions.
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services.
- Other please explain in the box below:

### 2. What are the overall aims, objectives and intended outcomes of the policy or practice?

This policy will establish a clear framework for managing waste and recycling collection services on un-adopted roads and private tracks within Flintshire. The policy provides guidelines for conducting risk assessments, collaborating with landowners, conducting regular reviews, and ensuring compliance with legal obligations.

There are currently a number of households, mainly in the more rural areas, which receive a recycling collection service (recyclables, food waste or garden waste) or refuse collection service (residual waste) that require collection vehicles to travel along un-adopted roads and private tracks. In some cases, these roads are in poor condition and consequently access can be difficult and potentially hazardous.

Un-adopted roads are privately owned, but still considered part of the highway. The responsibility to maintain these roads, rests with the owners, and the cost of repair and upkeep is not covered by local councils or the Trunk Road Agency. This policy aims to protect staff and ensure their safety, increase operational efficiency and engage with landowners to deliver a great service.

### 3. Who are the main consultative groups (stakeholders)?

- Flintshire CC staff
- Flintshire CC Streetscene and Transportation staff
- Flintshire residents
- Flintshire landowners

### 4. Is the policy related to, influenced by, or affected by other policies or areas of work (internal or external), e.g. strategic IIAs if this is an operational IIA and vice versa?

- Flintshire Waste Management Strategy
- Waste Collection Policy

## STEP 2 - Data, Engagement and Assessing the Impact

When completing this section, you need to consider if you have sufficient information with which to complete your IIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the IIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. The socio economic duty also requires us to **take into account the voices of those in the community including those with lived experience of socio economic disadvantage**. You should undertake engagement with communities of

interest or communities of place to understand if they are more affected or disadvantaged by your proposals. This needs to be proportionate to the policy or practice being assessed. Remember that stakeholders can also include our own workforce as well as partner organisations.

Before carrying out particular engagement activities, you should first look to data from recent consultations, engagement and research. This could be on a recent related policy or recent assessments undertaken by colleagues or other sources, e.g., [Is Wales Fairer?](#), [North Wales Background Data Document](#), Info Base Cymru, WIMD. This can help to build confidence among groups and communities, who can see that what they have said is being acted on. If you have very little or no information from previous engagement that is relevant to this IIA, you should undertake some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group. It is seldom acceptable to state simply that a policy will universally benefit/disadvantage everyone, and therefore individuals will be affected equally whatever their characteristics. The analysis should be more robust than this, demonstrating consideration of all of the available evidence and addressing any gaps or disparities. Specific steps may be required to address an existing disadvantage or meet different needs.

**The Gunning Principles**, established from past court cases, can be helpful in ensuring we apply fairness in engagement and consultation:

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision.

**5. Have you complied with the duty to engage as described above and are you sufficiently informed to proceed?**

Yes  No  *(please cross as appropriate X)*

**6. If Yes, what engagement activities did you undertake and who with?**

- Drivers and crews who undertake collections on unadopted roads have contributed to the risk assessments at the heart of this new policy and approach.
- The aforementioned risk assessments were carried out by Supervisors with first-hand experience of driving the roads affected.
- During the site visits, some members of the public were spoken to and given an opportunity to ask questions and give an opinion.
- Once the policy is approved, consultation with all properties affected will take place either in group meetings or face to face site meetings.
- Trade Unions

7. **If No, you may wish to consider pausing at this point while you undertake (further) engagement activities which you can include in the action plan below.** Please incorporate any information obtained from this additional activity in the boxes in question 8.

Action	Dates	Timeframe	Lead Responsibility	Information added to IIA (✓)

8. **What information do you hold about the impact on each of the following characteristic and statutory considerations / duties from your experience of current service delivery and recent engagement or consultation?** Include any additional relevant data; research and performance management information; surveys; Government, professional body or organisation studies; Census data; Is Wales Fairer? (EHRC<sup>2</sup> data); complaints/compliments; service user data and feedback; inspections/ audits; socio-economic data including WIMD<sup>3</sup> data. You may wish to include sub-headings showing where each element of your data has come from, e.g. national data, local data, organisation data, general or specific engagement exercises, etc.

Consider any positive or negative impact including trends in data, geography (urban or rural issues), demography, access issues, barriers, etc. Also include any areas where there are inequalities of outcome resulting from socio-economic disadvantage or other relevant issues identified by communities of interest or communities of place (i.e. where stakeholders, service users, staff, representative bodies, etc. are grouped together because of specific characteristics or where they live) and any issues identified for people living in less favourable social and/or economic circumstances.



Prompts for  
Equality Impact Assessment

<sup>2</sup> Equality and Human Rights Commission


<sup>3</sup> Wales Index of Multiple Deprivation




Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
<b>Age</b>	Assisted collections data – CRM Site Specific Risk Assessments	Potential positive impact through the identification of households who do not currently make use of assisted collections.	Older People Children Young People Working Age People Young Families Demographics NB: Where children / young people are affected complete the <a href="#">Childrens Rights Checklist</a> <a href="#">United Nations Convention on the Rights of the Child (UNCRC)</a> Caring responsibilities
<b>Disability</b>	Assisted collections data – CRM Site Specific Risk Assessments	Potential positive impact through the identification of households who do not currently make use of assisted collections.	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities, induction loops, signage Access to communication methods, use of British Sign Language, Easy Read Carers Dietary requirements Other Long Term Health Conditions <a href="#">United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)</a>
<b>Gender Reassignment</b>	No impact foreseen	No discernible impact	A person who proposes to, starts or has changed their gender identity Transgender

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			Appropriate language use, i.e. gender neutral language, appropriate pronouns Gender neutral changing facilities and toilets confidentiality
<b>Marriage &amp; Civil Partnership</b>	No impact foreseen	No discernible impact	Marital status Civil Partnership status Reference to partners and not assuming husband and wife relationships /terminology
<b>Pregnancy &amp; Maternity</b>	Assisted collections data – CRM Site Specific Risk Assessments	Potential positive impact through the identification of households who do not currently make use of assisted collections.	Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers Access to breast feeding facilities Dress codes/uniforms- do they accommodate pregnant women
<b>Race</b>	No impact foreseen	No discernible impact	Consider Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Use of plain language Refugee / Asylum Seekers Migrants Positive Action Awareness events <a href="#">United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)</a>
<b>Religion &amp; Belief</b>	No impact foreseen	No discernible impact	Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism Other philosophical beliefs

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			Dress code/uniforms Religious festivals/activities Buildings – access to prayer room facilities
<b>Sex</b>	No impact foreseen	No discernible impact	Men / Women Gender Identity Toilet facilities/baby changing Childcare Gender Pay Gap Sex workers <a href="#">United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)</a>
<b>Sexual Orientation</b>	No impact foreseen	No discernible impact	Gay Lesbian Bi-sexual Heterosexual Terminology - Avoid making assumptions about a person's sexual orientation use gender-neutral terms such as partner(s). Confidentiality about sexuality Further resources available from <a href="#">Stonewall Cymru</a>
<b>Socio-economic Considerations- Reducing inequalities caused by socio-economic disadvantage</b>	No impact foreseen	No discernible impact	People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries. 'Intersectionality' issues - where identity compounds socio-economic status, e.g., single

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			<p>parents (often women), disabled people, some BAME groups. Examples include lower levels of good health, lower paid work, poorer educational attainment and an increased risk of being a victim of crime</p> <p>Further resources available from Welsh Government including examples of <a href="#">inequalities of outcome caused by socio-economic disadvantage</a></p>  <p>Inequalities of outcome.pdf</p>
<b>Human Rights</b>	No impact foreseen	No discernible impact	See Human Rights Articles below. <a href="https://humanrightstracker.com/en/">https://humanrightstracker.com/en/</a> on EHRC website
<b>Other (please state)</b>	No impact foreseen		E.g., Modern Slavery, Safeguarding, Other COVID effects, Carers, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless
Welsh Language			
<b>Welsh Language</b>	No impact foreseen	No discernible impact	Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Availability of Welsh speaking employees Technology

Equality and Human Rights			
Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
			Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Migration Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education.   20200921 DG S Policy making stand

<b>Human Rights Act 1998</b> <ul style="list-style-type: none"> <li>• Article 2 Right to life</li> <li>• Article 3 Freedom from torture and inhuman or degrading treatment</li> <li>• Article 4 Freedom from Slavery and forced labour</li> <li>• Article 5 Right to liberty and security</li> <li>• Article 6 Right to a fair trial</li> <li>• Article 7 No punishment without law</li> </ul>	<ul style="list-style-type: none"> <li>• Article 8 Respect for private life, family, home and correspondence</li> <li>• Article 9 Freedom of thought, belief and religion</li> <li>• Article 10 Freedom of expression</li> <li>• Article 11 Freedom of Assembly and association</li> <li>• Article 12 Right to marry and start a family</li> <li>• Article 13 Right to access effective remedy if rights are violated</li> <li>• Article 14 Protection from discrimination</li> </ul>
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**Environment and Biodiversity**

	<b>Relevant Data/Information</b>	<b>Positive and /or negative impacts</b>	<b>Prompts (not an exhaustive list)</b>
<b>Reducing greenhouse gas emissions</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management Site Specific Risk Assessments	Positive Impact - By regularly assessing conditions on un-adopted roads, will ensure a more effective use of fleet and highways assets, reducing the need for repairs, replacements, and maintenance of fleet and private property. The policy will reduce the need for HGV and promote the use of smaller vehicles in some areas of the county.	Will energy need be met through renewable sources? Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? * Will it reduce ozone depleting emissions? Will it reduce emissions through retrofitting new technology? Will it reduce heat island effects on people and property?
<b>Plan for future climate change</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management Site Specific Risk Assessments	The policy introduces safer working practices and reduces the need for repairs, replacements, and maintenance of fleet and private property.	Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfall by improving flood resistance and flood resilience? Will it reduce combined sewer overflow events? Will it encourage the re-use of resources? Will it encourage sustainable construction methods and procurement? Will it encourage water efficiency and drought resilience?
<b>Pollution: air, water/ soil/noise</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management	Positive Impact - Rural roads be affected by reduced traffic from	Will it reduce combined sewer overflow events? Will it improve air quality? *

Environment and Biodiversity			
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
<b>and vibration and emissions</b>	The Gazetteer Mayrise asset management system Biodiversity Grass Cutting Policy Site Specific Risk Assessments	heavy goods vehicles, prolonging the life of the road surface.	Will it reduce emissions of key pollutants? Will it reduce noise concerns and noise complaints? Will it reduce noise levels?
<b>Integrating biodiversity into decision making</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management The Gazetteer Mayrise asset management system Grass Cutting Policy Site Specific Risk Assessments	Positive Impact Rural roads will potentially be positively affected by reduced traffic from heavy goods vehicles, prolonging the life of the road surface and reducing damage to vegetation and hedges.	Have you considered the impacts and opportunities for action for biodiversity at early stages Are the impacts of procurement on biodiversity considered? Are products sourced sustainably? Have the wider benefits of improved biodiversity been considered, flood prevention, health and wellbeing, recreation? Can you link with other strategies and initiatives for biodiversity e.g. FCC Environment and Sustainability policy, FCC Section 6 Plan, FCC Urban tree and woodland plan?
<b>Increasing the resilience of our natural environment?</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management The Gazetteer Site Specific Risk Assessments	Positive Impact Rural roads will potentially be positively affected by reduced traffic from heavy goods vehicles, prolonging the life of the road surface and reducing damage to vegetation and hedges	Does the proposal work with nature and consider the use of nature-based solutions first and foremost? Does your proposal support the creation of new habitats (in addition to any mitigation or compensation habitat) Does it contribute to the restoration of degraded habitats? Does it improve site management to improve nature value?
<b>Improving understanding</b>	Priority: Green Council	Positive Impact Rural roads will potentially	Can your proposal promote understanding of biodiversity?


Environment and Biodiversity			
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
<b>and raise awareness of the importance of biodiversity</b>	Sub-Priority: Sustainable Development & Environmental Management The Gazetteer Mayrise asset management system Grass Cutting Policy Site Specific Risk Assessments	be positively affected by reduced traffic from heavy goods vehicles, prolonging the life of the road surface and reducing damage to vegetation and hedges	Can the delivery of public goods and services such as social care, community health and recreation promote biodiversity? Can your proposal promote biodiversity with partners/beneficiaries
<b>Encouraging resource efficiency (energy, water, materials and minerals)</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management The Gazetteer Mayrise asset management system Grass Cutting Policy	Positive Impact - By regularly assessing conditions on un-adopted roads, will ensure a more effective use of fleet and highways assets, reducing the need for repairs, replacements, and maintenance of fleet and private property.	Will it reduce water consumption and improve water efficiency? Will it reduce energy consumption? *
<b>Reducing waste production and increase recycling, recovery and re-use of waste</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management The Gazetteer Mayrise asset management system Grass Cutting Policy	Positive Impact - By regularly assessing conditions on un-adopted roads, will ensure a more effective use of fleet and highways assets, reducing the need for repairs, replacements, and maintenance of fleet and private property.	Will it reduce consumption of materials and resources? Will it reduce household waste? Will it increase recycling, recovery and re-use? Will it reduce construction waste?




**Environment and Biodiversity**

	<b>Relevant Data/Information</b>	<b>Positive and /or negative impacts</b>	<b>Prompts (not an exhaustive list)</b>
<b>Reducing need to travel and promote sustainable forms of transport</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental	The policy will reduce the need for HGV and promote the use of smaller vehicles in some areas of the county.	Will it reduce volumes of traffic? Will it encourage walking and cycling?*
<b>Improving the physical environment: housing, public space, access to and quality of green space</b>	Priority: Green Council	No discernible impact	Will it reduce litter? Will it enhance the quality of public realm? Will it improve access and mobility for all equality groups Will it improve open space? Will it improve landscape character? Will it minimise development on Greenfield sites
<b>Protecting and enhancing the historic environment and architectural, archaeological and cultural heritage</b>	Priority: Green Council Sub-Priority: Sustainable Development & Environmental Management The Gazetteer Mayrise asset management system	No discernible impact	Will it protect heritage sites and cultural value? Will it protect strategic views? Will it protect listed buildings and their settings? Will it help preserve, enhance and record archaeological features and their settings?


**Health**


<b>Determinants of health</b>	<b>Relevant data /information</b>	<b>Positive and /or negative impacts</b>	<b>Prompts</b> (not an exhaustive list) Guidance from   HIA_Tool_Kit_V2_W EB.pdf
<b>Lifestyles</b>	No data	No discernible impact	Diet Physical activity Use of alcohol, cigarettes, non-prescribed drugs Sexual activity Other risk-taking activity
<b>Social and community influences on health</b>	No data	No discernible impact	Family organisation and roles Citizen power and influence Social support and social networks Neighbourliness Sense of belonging Local pride Divisions in community Social isolation Peer pressure Community identity Language/Cultural and spiritual ethos Racism Other social exclusion
<b>Mental well-being</b>	No data	No discernible impact	Does this proposal support sense of control? Does it enable participation in community and economic life? Does it impact on emotional wellbeing and resilience?

**Health**

<b>Determinants of health</b>	<b>Relevant data /information</b>	<b>Positive and /or negative impacts</b>	<b>Prompts</b> (not an exhaustive list) Guidance from   HIA_Tool_Kit_V2_W EB.pdf
<b>Living/environmental conditions affecting health</b>	No data	Positive impact - Rural roads will potentially be positively affected by reduced traffic from heavy goods vehicles, prolonging the life of the road surface and reducing damage to vegetation and hedges. This will also reduce noise, vibration, and air pollution.	Built environment Neighbourhood design Housing Indoor environment Noise Air and water quality Attractiveness of area Green space Community safety Smell/odour Waste disposal Road hazards Injury hazards Quality and safety of play areas
<b>Economic conditions affecting health</b>	No data	The policy promotes safer working and demonstrates our commitment to prioritise the safety of staff and customers	Unemployment Income Economic inactivity <input type="checkbox"/> Type of employment Workplace conditions
<b>Access and quality of services</b>	No data	Residents who live on unadopted or private roads will have a direct input to the service they receive	Medical services Other caring services Shops and commercial services Public amenities

**Health**

<b>Determinants of health</b>	<b>Relevant data /information</b>	<b>Positive and /or negative impacts</b>	<b>Prompts</b> (not an exhaustive list) Guidance from   HIA_Tool_Kit_V2_W EB.pdf
		through face to face consultation. Where an un-adopted road has multiple residents, they will be encouraged to work together to find a cohesive, community lead decision.	Transport including parking Education and training Information technology
<b>Macro-economic, environmental and sustainability factors</b>	The Environment (Wales) Act Priority: Green Council Site Specific Risk Assessments	Positive Impact Rural roads will potentially be positively affected by reduced traffic from heavy goods vehicles, prolonging the life of the road surface and reducing damage to vegetation and hedges Positive Impact - By regularly assessing conditions on un-adopted roads, will ensure a more effective use of fleet and highways assets, reducing the need for repairs, replacements,	Government policies Gross Domestic Product Economic development Biological diversity Climate

Health			
<b>Determinants of health</b>	<b>Relevant data /information</b>	<b>Positive and /or negative impacts</b>	<b>Prompts</b> (not an exhaustive list) Guidance from   HIA_Tool_Kit_V2_W EB.pdf
		and maintenance of fleet and private property.	

United Nations Conventions on the Rights of the child			
	<b>Relevant data or information</b>	<b>Positive and/or negative impacts</b>	Prompts (not exhaustive)
<b>Relevant Article</b>	No impact foreseen	No discernible impact	<a href="#">Summary of conventions</a>

There are four articles in the convention that are seen as special. They're known as the "General Principles" and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:	
<b>Article 2</b>	The Convention applies to every child without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background
<b>Article 3</b>	(best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children.
<b>Article 6</b>	(life, survival and development) Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential
<b>Article 12</b>	2 (respect for the views of the child) Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child's day-to-day home life

**9. Are there any data or information gaps and if so what are they and how do you intend to address them?**

Currently the individual circumstances of residents on unadopted roads is unknown and will be established via consultation with groups and individuals. Each household will have direct input into the provision of service to those properties affected.

Note: If it is not possible to obtain this information now, you should include this in your action plan in Step 6 so that this information is available for future IIAs.

**10. How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011), to ensure the Welsh language is not treated less favourably than the English language, and that every opportunity is taken to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?**

The service will ensure that all communications and information related to this policy are available in both English and Welsh. This includes documents, notifications, and digital platforms used for customer engagement. Adequate language support should be provided for residents who speak Welsh to ensure accessibility and inclusivity.

**11. If this IIA is being updated from a previous version of a similar policy or practice, were the intended outcomes of the proposal last time achieved or were there other outcomes? (Please provide details, for example, was the impact confined to the people you initially thought would be affected, or were other people affected and if so, how?)**

Not applicable.

**12. What is the cumulative impact of this proposal on different protected groups when considering other key decisions affecting these groups made by the organisation? (You may need to discuss this with your Chief Officer or Cabinet Member to consider more widely if this proposal will affect certain groups more adversely because of other decisions the organisation is making, e.g., financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc)**

The cumulative impact is fundamentally positive as we are improving the safety of staff and customers over the long term. The long-term environmental benefits in terms of reduced noise and air pollution will also positively impact on the affected communities. In addition, this

new policy will allow us to identify customers with additional needs that may have yet not been identified, giving us the opportunity to offer enhanced services such as assisted collections.

**13. How does this proposal meet with each of the 7 goals of the Well-being of Future Generations (Wales) Act 2015?**

For more information, please see: <https://futuregenerations.wales/about-us/future-generations-act/>

Prosperous Wales	Positive – Protecting the staff customers and assets of Flintshire CC to ensure continued service and well-being
Resilient Wales	Positive – Reducing use of raw materials through reduced repairs, replacement and maintenance of fleet
Healthier Wales	Positive – Reducing risk of injury to staff and customers
More equal Wales	No Impact
Cohesive Wales	No Impact
Vibrant Wales	Positive – Promoting a positive approach to staff and customer safety and well-being
Globally responsible Wales	Positive – Reducing use of raw materials through reduced repairs, replacement and maintenance of fleet

**14. How does this proposal meet with the 5 ways of working of the Well-being of Future Generations (Wales) Act 2015 ?**

For more information, please see: <https://futuregenerations.wales/about-us/future-generations-act/>

Long Term	Preserving the services of waste and recycling services safely to the people of Flintshire
Prevention	Preventing damage and injury to the people and assets of FCC
Integration	No impact
Collaboration	Working with customers to find collaborative solutions that continue services and prioritise safety
Involvement	Engaging customers to find solutions that continue services and prioritise safety

15. **Describe any intended negative impact identified and explain why you believe this is justified** (for example, on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not or because of an objective justification<sup>1</sup> or positive action<sup>2</sup>)

Customers who refuse to engage in the collaborative nature of the policy may lose the option of a boundary collection service in favour of a nominated collection point on the adopted highway.

**Note<sup>1</sup>: Objective Justification** - gives a defence for applying a policy, rule or practice that would otherwise be unlawful direct or indirect discrimination. To rely on the objective justification defence, the employer, service provider or other organisation must show that its policy or rule was for a good reason – that is 'a proportionate means of achieving a legitimate aim'. A **legitimate aim** is the reason behind the discrimination which must not be discriminatory in itself and must be a genuine or real reason, e.g., health, safety or welfare of individuals. If the aim is simply to reduce costs because it is cheaper to discriminate, this will not be legitimate. Consider if the importance of the aim outweighs any discriminatory effects of the unfavourable treatment and be sure that there are no alternative measures available that would meet the aim without too much difficulty (proportionate) and would avoid the discriminatory effect.

**Note<sup>2</sup>: Positive Action** - Where an employer takes specific steps to improve equality in the workplace to address any imbalance of opportunity, lessen a disadvantage or increase participation in a particular activity, for example, increasing the number of disabled people in senior roles where they are under-represented by targeting specific groups with job adverts or offering training to help create opportunities for certain groups. The public sector is expected to consider the use of positive action to help them comply with the Public Sector Equality Duty.

16. **Could any of the negative impacts identified amount to unlawful discrimination but are perceived to be unavoidable (e.g., reduction in funding)?**

Yes  No  Not Sure  *(Please double click on the relevant box (X) and select 'checked' as appropriate)*

17. **If you answered Yes or Not Sure to question 15, please state below, which protected group(s) this applies to and explain why (including likely impact or effects of this proposed change)**

18. **If you answered No to question 15, are there any barriers identified which amount to a differential impact for certain groups and what are they?**

Not applicable



### STEP 3 - Procurement and Partnerships

The Public Sector Equality Duty (PSED) requires all public authorities to consider the needs of protected characteristics when designing and delivering public services, including where this is done in partnership with other organisations or through procurement of services. The Welsh Language Standards also require all public authorities to consider the effects of any policy decision, or change in service delivery, on the Welsh language, which includes any work done in partnership or by third parties. We must also ensure we consider the Socio-economic Duty when planning major procurement and commissioning decisions to consider how such arrangements can reduce inequalities of outcome caused by socio-economic disadvantage.

When procuring works, goods or services from other organisations (on the basis of a relevant agreement), we must have due regard to whether it would be appropriate :

- for the award criteria for that contract to include considerations to help meet the General Duty (to eliminate discrimination, promote equality of opportunity and foster good relations);
- to stipulate conditions relating to the performance of the contract to help meet the three aims of the General Duty.

This only applies to contractual arrangements that are “relevant agreements” which means either the award of a ‘public contract’ or the conclusion of a ‘framework agreement’, both of which are regulated by the Public Sector Directive (Directive 2004/18/EC) which regulates the specified EU thresholds. Further information can be found [here](#).

We must consider how such arrangements can improve equal opportunities and reduce inequalities of outcome due to protected characteristics and caused by socio-economic disadvantage, particularly on major procurement and commissioning decisions. The PSED applies to the work that private sector organisations undertake when delivering a public function on our behalf. We therefore need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty under Section 149 of the Equality Act 2010. In the same way, the Welsh Language Standards applies to any work undertaken on behalf of, and in the name of, public bodies that are themselves subject to the Standards, and so consideration should be given to how these requirements are monitored and communicated through the procurement documents. The Socio Economic Duty does not pass to a third party through procurement, commissioning or outsourcing. Therefore when we work in partnership with bodies not covered by the Socio Economic Duty, the duty only applies to us as the relevant public body.

#### 19 Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes  No  (Please double click on the relevant box (X) and select ‘checked’ as appropriate)

If No, please proceed to Step 4

**20. If Yes, what steps will you take to comply with the General Equality Duty, Human Rights and Welsh Language Legislation and the Socio-Economic Duty in regard to procurement and/or partnerships? Think about :**

**Procurement**

- Setting out clear equality expectations in Tendering and Specification documentation, showing how promotion of equality may be built into individual procurement projects
- On what you based your decisions in the award process, including consideration of ethnical employment and supply chain code of practice
- Ensure that contract clauses cover the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and socio-economic requirements as well as Welsh Language Duties (remember that any duties from the Welsh Language Measure 2011 and Welsh Language Standards are also applicable to services provided on your behalf under contract by external bodies).
- Performance and Monitoring measures are included to monitor compliance, managing and enforcing contracts

**Partnerships**

Be clear about who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessments
- Delivering the actions from the IIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners
- Demonstrating due regard to the Public Sector Equality Duty and the Socio-Economic duty

**STEP 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice**

**21. When considering proportionality, does the policy or practice have a significantly positive or negative impact or create inequalities of outcome resulting from socio-economic disadvantage?**

(Please give brief details)

<b>Significantly positive impact</b>	<b>Significantly negative impact</b>
No discernible impact	No discernible impact

**22. It is important that you record the mitigating actions you will take in developing your final policy/practice draft. Record here what measures or changes you will introduce to the policy or practice in the final draft which could reduce or remove any unlawful or negative impact or disadvantage and/or improve equality of opportunity/introduce positive change; or reduce inequalities of outcome resulting from socio-economic disadvantage? (This could also inform the Action Plan in Q30)**

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the Policy/Practice	Completed (✓)

**23. Will these measures remove any unlawful impact or disadvantage?**

Yes  No  (Please double click on the relevant box (X) and select 'checked' as appropriate)

**24. If No, what actions could you take to achieve the same goal by an alternative means?**

Not applicable

**25. What measures or changes in the following important legislative areas have you included to strengthen or change the policy/practice:**

- a) to foster good relations and advance equality of opportunity as covered by the General Duty in the Equality Act 2010;
- b) to reduce inequalities of outcome as a result of socio-economic disadvantage;
- c) to increase opportunities to use the Welsh language and in treating the Welsh language no less favourably than the English language as set out in the Welsh Language (Wales) Measure 2011 and reduce or prevent any adverse effects that the policy/practice may have on the Welsh language?

Engagement with operational staff to identify and complete risk assessments.  
 Engagements with customers on a case-by-case basis to establish collaborative solutions.  
 All correspondence, literature and engagement will be provided in English and Welsh.

**26. Do you have enough information to make an informed judgement?**

Yes  No  (Please double click on the relevant box (X) and select 'checked' as appropriate)

**27. If you answered Yes, please justify:**

The policy is driven by the safety of staff and customers and any potential impact will be addressed and mitigated on a case-by-case basis. Impact will also be monitored annually to ensure dynamic changes can be made to address them.

**28. If you answered No, what information do you require and what do you need to do to make a decision?**

(Note: Should data collection be included in the action plan (Step 6)?)

**[You may need to stop here until you have obtained the additional information]**

**STEP 5 - Decision to Proceed**

**29. Using the information you have gathered in Steps 1 – 4 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?**

*(Please double click on the relevant box (X) and select 'checked' as appropriate)*

<b>Decision</b>	
<input checked="" type="checkbox"/> Yes	Continue with policy or practice in its current form
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement or to remove any areas of adverse impact identified in Step 4
<input type="checkbox"/> Yes	Continue with the plan as any detrimental impact can be justified
<input type="checkbox"/> No	Do not continue with this policy or practice as it is not possible to address the adverse impact. Consider alternative ways of addressing the issues.

**30. Are there any final recommendations in relation to the outcome of this Equality Impact Assessment?**

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**STEP 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data**

The IIA process is an ongoing one that doesn't end when the policy/practice and IIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced or amended this new policy or practice. If you do not hold relevant data, then you should be taking steps to rectify this in your action plan. To review the EHRC guidance on data collection you can review their [Measurement Framework](#).

**31. Please outline below any actions identified in Steps 1-5 or any additional data collection that will help you monitor your policy/practice once implemented:**

Action	Dates	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Carry out customer engagement and communication plan.		Quarterly	Kevin Edwards	
Create monitoring plan to ensure effective execution of the policy.		Q1	Kevin Edwards	
Create new Safe System of Work (SSoW) documents for all identified routes		Quarterly	Kevin Edwards	

**32. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice including timescales for when it should be formally reviewed:**

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Impact on customer engagement	Quarterly	Kevin Edwards	
Accident and incidents on identified routes	Quarterly	Kevin Edwards	

Waste and Recycling performance relating to the identified routes	Quarterly	Kevin Edwards	
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### **STEP 7 - Publishing the Integrated Impact Assessment**

Please arrange for this completed IIA to be agreed by your Chief Officer and arrange for translation and publishing with a copy sent to Stephanie Aldridge: [stephanie.aldridge@flintshire.gov.uk](mailto:stephanie.aldridge@flintshire.gov.uk).