

## APPENDIX B – Equalities Impact Assessment Form and Action Table

"I shall try to explain what "due regard" means and how the courts interpret it. The courts have made it clear that having due regard is **more than having a cursory glance** at a document before arriving at a preconceived conclusion. Due regard requires public authorities, in formulating a policy, to give equality considerations the weight which is **proportionate in the circumstances**, given the potential impact of the policy on equality. It is not a question of box-ticking; it requires the equality impact to be **considered rigorously and with an open mind.**"

**Baroness Thornton, March 2010**

### Why are you completing the Impact Assessment?

Change to Policy or Service

What are you completing the Impact Assessment on (which policy, service, MTFP reference, cluster etc)?

**New arrangements for recycling and refuse collections, mainly applying to all receiving kerbside collection services.**

### Section 1 – Description of what is being impact assessed

Currently, kerbside services consist of weekly recycling collections for food, paper, card, glass bottles and jars, cans and aerosols, foil, plastic bottles, textiles and shoes, alongside fortnightly collections for refuse (residual waste left over after recycling) and garden waste (optional service with a fee).

Blocks of flats receive a communal service with shared bins for paper, glass bottles and jars, cans and aerosols and refuse. In a separate project, plastic bottles and cardboard will be added to these collections during 2017.

Kerbside services will change to a new service model to be called Recycle More. Weekly recycling collections will continue with plastic pots, tubs and trays, small electricals and batteries added and garden waste collections will continue as currently. Refuse collections will change to being every three weeks.

It is planned to add the same additional plastics to the communal services for blocks of flats. Communal collection frequencies will continue to match current requirements for emptying at least every fortnight and so that no more than 80% of refuse containers on each site are full at any time (some require weekly and more frequent emptying, which will continue where needed). Different communal refuse frequencies may be agreed with SWP's Contract Manager where an acceptable service would be maintained, which could involve three-weekly collections in some cases.

Additional refuse capacity will be provided for the collection of nappies and adult hygiene products (AHP) and additional arrangements made to communicate collection days to residents.

### Section 2A – People or communities that are **targeted or could be affected** (for Equalities - taking particular note of the Protected Characteristic listed in action table)

All households in Somerset (approximately 250,000).

**Section 2B – People who are delivering the policy or service**

Staff of Somerset Waste Partnership and our collection contractor, Kier MG, and Customer Services teams at partner District Councils and the County Council in Somerset.

**Section 3 – Evidence and data used for the assessment (Attach documents where appropriate)**

Trials were undertaken covering over 5,000 households in Taunton Deane in 2014, with 1,200 on two rounds receiving the collection arrangements, including three-weekly refuse, now proposed. Prior to these trials, a focus group was held to discuss recycling collection container options for the collection of additional materials. At the end of the trials, all households were supplied with a survey form and invited to return this online or using a freepost address. There was a 30% response rate (369 submissions) from the two rounds with the new collection arrangements, with 81% of these saying the new collection arrangements were better than current arrangements (13% did not know and 6% said they were worse). 86% said they would prefer for the trial arrangements to continue rather than go back to the previous arrangements (fortnightly refuse without the extra recycling).

5.1% of the 369 survey respondents were aged 16-34, 18.3% were 35-49, 33.8% were 50-64 and 42.8% were 65 or over. 77.2% had lived in the area for more than 4 years, 8.1% for 2-03 years, 8.9% for 1-2 years and 5.8% for less than 1 year. 18.9% considered themselves to have a disability or long term health condition.

Inspections were made of collections during the trials, especially on the two rounds with three-weekly refuse. At the start, this helped to identify those who were not aware or had not understood the collection changes, by noting those putting refuse out on the first day that a previous fortnightly refuse collection would have been made but which had changed due to the new three-weekly cycles. These were then directly contacted, mostly on the same day and face to face if possible, by knocking on their doors. A targeted letter was delivered where no-one was home. Full service information was provided and explained and any issues addressed.

A report on the trials with full survey results was presented to Somerset Waste Board in June 2015 (item 11 at: <http://www1.somerset.gov.uk/council/meetings/reports.asp?item=1180>).

A focus group, involving residents of Taunton Deane, was held in 2013 before the trials to discuss collection containers and potential options if more materials were recycled. Preferences expressed were taken into account in the design of the trial, especially the use of a reusable bag.

Also, as part of the advance preparation for the trials, volume calculations showed that for average household waste arisings, the volume removed from refuse by allowing recycling of plastic pots, tubs and trays more than offset the refuse volume reduction from the change in picking up a standard 180-litre refuse bin every fortnight (90 litres per week) to every three weeks (60 litres per week).

Guidance will be followed from a report commissioned by Zero Waste Scotland on 'The potential health impacts of extending the frequency of non- recyclable waste collections' (July 2014), which reviewed impacts for a refuse collection service being provided every four weeks. This concluded that "the availability of simple precautions mean the risk for [householders] is little changed from that experienced with existing weekly and fortnightly collections." These precautions include providing a separate, frequent food waste collection (already provided by SWP), increasing food

waste capture (successful SWP projects in 2015 which will be boosted further by Recycle More), and encouraging householders to adopt good practice for storage (refuse bins are provided to most households with suitable space and others are instructed to use refuse sacks), to bag refuse and to wash hands and work surfaces after handling waste. The report also recommended to:

- Undertake composition analysis to understand the biodegradable content of non-recyclable waste (analysis has been undertaken by SWP and can be repeated if thought necessary due to composition changes).
- Develop policies for missed collections to limit collection delays, particularly when the service is bedding in and residents may have difficulty remembering their collection schedule (SWP policy and arrangements are to pick up missed collections within two working days).
- Residents may wish to wash their wheeled bins to clean out residues and maintain good hygiene practices (advice to be provided on SWP website and occasionally in other publications, such as Your Somerset).

Bury, Falkirk and Gwynedd Councils, where three weekly refuse collections have been operating for over a year, have been contacted to gain lessons on their experience and service arrangements. Overall, these councils reported that some residents had initial concerns before the new collections started, especially with regard to a three weekly refuse service, but once the services were in place, complaints reduced and most concerns appeared not to be realised in practice.

<b>Impacts and mitigations Action Table</b>			
<b>Identified issue drawn from your conclusions</b>	<b>Actions needed – can you mitigate the impacts? If you can how will you mitigate the impacts?</b>	<b>Who is responsible for the actions? When will the action be completed?</b>	<b>How will it be monitored? What is the expected outcome from the action?</b>
<p><b>Age:</b> New issues or impacts should not arise as a result of these service changes, but, due to refuse being collected every three weeks (instead of every two weeks as currently), existing impacts may be increased for some older people, as a higher proportion may have extra medical or sanitary waste for disposal or have issues with independently managing their</p>	<p>Notification packs distributed before roll-outs will carry clear advice to attend a roadshow or contact Customer Services if there are concerns or likely to be issues with three-weekly collections of refuse, including the volume capacity provided. Somerset Waste Partnership will then agree appropriate support for the resident.</p> <p>Weekly clinical waste collections will continue to meet the statutory requirements. Hygiene waste will continue to be accepted with refuse and additional capacity (stickers for sacks or a bigger or extra bin) provided if needed and requested, with a form included for this purpose in notification packs.</p>	<p>Somerset Waste Partnership</p> <p>Notification packs will be provided and roadshows held in advance of service roll outs.</p> <p>Collection calendars are to be provided with service leaflets to all households. It is planned that these will cover up to and including the following two calendar years, when they will be reissued.</p>	<p>Monitored by on-going recording and reporting of number and type of enquiries about waste services.</p> <p>Also questions to monitor can be included in SWP's service tracker survey every three years.</p> <p>Outcome is expected to be that most residents, including those in older age groups,</p>

<p>affairs. One set of potential impacts relate to the less frequent collection of refuse and especially adult hygiene products. Another set of impacts relate to understanding and recalling new service arrangements, including the three-weekly cycle for refuse collections and the additional materials recycled.</p>	<p>Acceptance of adult hygiene products on weekly clinical waste collections will also be considered on a case-by-case basis where needed to address specific issues.</p> <p>Roadshows will be held before service roll-outs and promoted in notification packs, local press and through local posters and parish councils. Roadshows tend to be particularly welcomed and attended by older people, who have the opportunity to ask questions and raise any matters of concern, so these can be addressed, where possible.</p> <p>Service leaflets will follow accessibility guidelines and provide a clear guide to new service arrangements. Guidance will include bagging all refuse, double bagging any refuse that may smell, washing hands and surfaces after handling waste.</p> <p>To assist with awareness of collection days, collection calendars are to be provided and other aids, such as email alerts and a smartphone app.</p> <p>To help identify and then directly contact households who may not have understood or be aware of the new collections, SWP plans to inspect complete collection rounds on the first time that a previous fortnightly refuse collection is not made due to the change to new three-weekly cycles. Targeted information and full service details will be provided, which will also be explained face to face where someone is home; otherwise, a helpful notification letter will be delivered, which includes contact details. Any issues raised will be addressed.</p>	<p>Inspections will be undertaken on the first time that a refuse collection is moved that would have been made on previous fortnightly cycles for all rounds. They will also be undertaken on other collection days following the introduction of the new services, especially in any areas where it is understood difficulties with the new arrangements are being experienced.</p>	<p>understand the service changes and special arrangements are provided where needed.</p>
<p><b>Disability:</b> Due to refuse being</p>	<p>Some issues listed will be addressed by the actions proposed</p>	<p>SWP</p>	<p>SWP will monitor demand for</p>

<p>collected every three weeks (instead of every two weeks, as currently), existing impacts may be increased for some people with disabilities who have extra medical or sanitary waste arising.</p> <p>The change in frequency may be harder to manage for people who have issues with independently managing their affairs.</p> <p>There may be issues for people living independently with a learning disability on a path to independence, who may need accessible guidance or additional support in managing a more complex waste routine.</p> <p>People with significant visual impairment will not be able to access printed leaflets.</p>	<p>above, including roadshows, clear literature using images to communicate changes and provision of services to manage adult hygiene waste.</p> <p>Options must be readily available on request to provide literature in large print, Braille, easy read and audio formats.</p> <p>There may be an increased demand for assisted collections for people who cannot independently manage their affairs. Customer service staff should be briefed to accept and log requests for assisted collections if submitted on this basis.</p> <p>Officer support should be available should we receive notification that a householder is struggling to understand the new collection frequencies. This would be in the form of on-demand home visits. We expect the demand for this to be low.</p> <p>SWP should identify disability groups and networks and proactively seek feedback on the impact of proposed changes, and ensure that feedback is considered and built into communication.</p>		<p>additional support and adjust resources to ensure adequate support is available through the course of the roll out.</p>
<p><b>Gender Reassignment:</b> No specific impacts identified.</p>			
<p><b>Marriage and Civil Partnership:</b> No specific impacts identified.</p>			

<p><b>Pregnancy and Maternity:</b> Families using disposable nappies for children may be impacted by this change due to the extra quantity arising with the longer period between refuse collections while, due to the changed frequency, their current refuse volume would be reduced if the capacity provided stayed the same.</p>	<p>Notification packs distributed before roll-outs will carry clear advice to attend accessible roadshows or to contact Customer Services if there are concerns or likely to be issues with nappy collections. Somerset Waste Partnership will then agree appropriate support for the resident.</p> <p>Notification packs will also encourage use of reusable washable nappies, by highlighting the waste and financial savings that arise for the household and by signposting further information.</p> <p>For current services, a supply of excess waste stickers is provided on request so families with children in disposable nappies can put out additional refuse sacks.</p> <p>With the service changes, this will be extended so that an additional refuse bin will also be offered as another option for the period that nappies continue to be used.</p>	<p>Somerset Waste Partnership</p> <p>Notification packs will be provided in advance of service roll outs.</p> <p>Advice on nappy collections and assistance will also be provided on service leaflets, on the SWP's website and by Customer Services teams.</p>	<p>Monitored by on-going recording and reporting of number and type of enquiries about waste services.</p> <p>Outcome is expected to be that families with children in nappies have additional arrangements available to meet their needs.</p>
<p><b>Race</b> (including ethnicity or national origin, colour, nationality and Gypsies and Travellers): Some people may not sufficiently understand communication materials due to primarily using another language to English and not having sufficient ability to interpret guidance provided in English.</p>	<p>Notification packs will include brief messages in other languages to allow those who need versions in other languages to request these.</p> <p>Advice will be sought on language options to offer, which it may be possible to vary by district.</p> <p>Details of the request will be recorded, so a suitable interpretation can also be provided for service leaflets.</p> <p>Communication materials, especially the notification pack and service leaflet, will include the use of photos and images to help people understand new service arrangements, as far as possible.</p>	<p>Somerset Waste Partnership</p> <p>Other language options will be offered in notification packs provided in advance of service roll outs.</p>	<p>Monitored by on-going recording and reporting of number and type of enquiries about waste services.</p> <p>Outcome is expected to be that those unable to sufficiently interpret English are provided with guidance in their preferred language and so are able to understand new collection arrangements.</p>
<p><b>Religion and Belief:</b> No specific impacts identified.</p>			

<b>Sex:</b> No specific impacts identified.			
<b>Sexual Orientation:</b> No specific impacts identified.			
<b>Other - caring responsibilities:</b> Due to refuse being collected every three weeks (instead of every two weeks, as currently), existing impacts may be increased for some people caring for those who have extra medical or sanitary waste arising for disposal or who have issues with independently managing their affairs.	In addition to above actions SWP will contact carers through carers networks to identify additional concerns to address.	SWP	Monitoring response to contact.
<b>Other – flats above shops:</b> These households may not have sufficient space for a full set of recycling containers and to store their refuse between collections every three weeks. Flats above shops are expected to be the property type which may have this issue, but other property types with the same issue will also be similarly considered.	It should be noted that providing a property has space to store and put out a full set of recycling containers (minimum of one box and food bin) and to store refuse between collections, then they should be OK to receive Recycle More services. Compared to current collections, Recycle More allow more materials to be recycled at the kerbside, including more plastics and cartons, so reducing the amount of refuse. This results in a greater volume of waste materials being collected weekly, rather than less frequently with refuse, with Recycle More.	Somerset Waste Partnership  These properties will be identified during round planning in advance of service roll-out.	Monitored by on-going recording and reporting of number and type of enquiries about waste services.
<b>Other</b> (including, rurality, low income, Military Status etc): Possible impact on	SWP will ensure reserve copies of literature are available on demand for those who have missed the initial communications.	SWP	Store of literature retained for 12 months after roll out is completed.

<p>service personnel who are out of the country for the period of the roll out.</p>			
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**Section 4 – Conclusions drawn about the equalities impact of the proposed change or new service/policy (Please use prompt sheet in the guidance for help with what to consider):**

Potential equality impacts of the change in service may arise for some households due to the less frequent collection of refuse, especially for nappies and adult hygiene products. Some households, particularly those living in flats above shops with limited storage, may have problems in storing a full set of recycling containers for weekly collections and refuse for three weekly collections.

Another set of potential impacts relate to understanding and recalling new service arrangements, including the three-weekly cycle for refuse collections and the additional materials recycled. As indicated above, some of the issues may be greater for some people, such as those who are older or have disabilities, than for others.

All these potential impacts can be mitigated by actions described in the table above.

**Section 5 – After consideration please state your final recommendations based on the findings from the impact assessment. Also include any examples of good practice and positive steps taken.**

Mitigation actions, as described in the table above, need to be planned and implemented as an integral part of the new service arrangements and change to Recycle More collections. SWP's Recycle More trials were an example of good practice, which included positive steps, such as advance notification, roadshows and inspection on collection days to identify and address with the service changes.

Evaluation of the trials have helped to identify proportionate further steps which it is planned to include as part of the roll-out of the new services.

**Section 6** - How will the assessment, consultation and outcomes be published and communicated? E.g. reflected in final strategy, published. What steps are in place to review the Impact Assessment

This impact assessment will be reported to members of Somerset Waste Board and partner authorities for decision as part of the report to confirm adoption of Recycle More collections. The report and assessment will be published on the internet via Somerset Waste Partnership and Somerset County Council's websites.

This impact assessment will be reviewed within two-three months after the start of each phase for the roll-out of Recycle More collections. Also within six months after roll-out has been completed.

SWP will maintain this impact assessment as a live document and address new equality issues that are identified or arise.

<b>Completed by:</b>	David Mansell		
<b>Date</b>	12 October 2016 (updated to version 2)		
<b>Signed off by:</b>	Steve Read		
<b>Date</b>	12 October 2016		
<b>Compliance sign off Date</b>	4 February 2016		
<b>To be reviewed by: (officer name)</b>	Mark Blaker		
<b>Review date:</b>	No later than three months after the start of each phase for the roll-out of Recycle More collections.		
<b>Version</b>	Draft 2.0	<b>Date</b>	12 October 2016