

## **Customer Equalities Impact Assessment**

<b>Policy/Procedure</b>	Waste Strategy 2022-2027
<b>Service</b>	Waste and Transport
<b>Date EIA Completed</b>	May 2022

**Note:** This Equality Impact Assessment (EIA) has been completed to reflect the impact on customers and users. A separate staff EIA has also been produced.

### **Equalities Impact Assessment**

Equality Impact Assessment (EqIA) is a rigorous and systematic tool for checking that policies/projects/practices and services take into account the needs of those groups identified in law as being at risk of discrimination (otherwise known as protected characteristics). This covers both our service users and our employees. It is important to note that EIAs should be done in a way that is both effective and proportionate to the size and structure of the organisation.

Amongst other things, EIAs are about considering any negative or adverse impacts that can be removed or mitigated where possible. Any negative or adverse impacts that amount to unlawful discrimination, must be removed. However, it is also important to note that EqIAs are not simply about removing potentially negative impacts, they are also an opportunity to identify ways to promote equality of opportunity and ensure greater access to public services. In brief, EqIAs provide a system of quality assurance and an opportunity to:

1. Eliminate discrimination
2. Tackle inequality
3. Improve access and remove any barriers to opportunities
4. Develop a better understanding of the community we serve by consulting our customers
5. Target resources efficiently
6. Adhere to the transparency and accountability element of the Public Sector Equality Duty
7. Consider the people who are not using our services and the possible reasons for this
8. Provide evidence that we are advancing equality of opportunity.

## SECTION 1

### What is the overall purpose and aim of the policy, project, practice or service?

#### **Waste Strategy Purpose/Vision:**

The Waste Strategy sets out our approach to managing waste and recycling collections in a more sustainable way, with the aim of reducing the environmental impact of waste in the New Forest.

#### **Aim**

We aim to provide the New Forest with a cost and carbon efficient recycling and waste service, that maximises the recovery of valuable natural resources and meets the needs and expectations of our residents. We will ensure that this service is compliant with forthcoming national legislation and compatible with any new working arrangements with our Hampshire partners.

#### **Objectives**

- Objective 1 – Minimise carbon impact of waste/recycling service

We are committed to taking all possible measures to help tackle climate change. We can do this by considering the carbon impact of each element of our waste collection service.

- Objective 2 – Increase quality and quantity of recycling

Our recycling rate is currently low when compared to other authorities, ranking 174th out of 216 waste collection authorities in England. Future recycling rate targets set by the government, will not be met without service changes. Contamination within the recycling is also increasing, and the council need to be able to provide feedback directly to residents to educate and help bring about behaviour change.

- Objective 3 - Reduce levels of overall household waste

Waste reduction remains top of the waste hierarchy; therefore, we must implement all possible actions proven to reduce levels of waste.

- Objective 4 – Legislative and regulatory compliance

As a waste collection authority, the council is required to comply with any legislation that central government pass in relation to waste collection services. Failing to meet requirements on current and new legislation or meet health and safety standards for staff may result in penalties upon the council.

#### **Key Actions/Changes:**

##### Waste Prevention:

- Restricting household general waste capacity through the use of wheeled bins
- Reduce the frequency of residual waste collection to fortnightly
- Introduce an effective side waste policy
- Promote home composting
- Promote food waste reduction campaign
- Resource and implement our waste prevention plan

Re-use:

- Increase reuse and repair of bulky waste
- Increase textiles reuse

Recycling actions:

- Introduce a separate weekly food waste collection
- Increase the range of dry materials that we collect from the kerbside
- Provide wheeled bins for mixed dry recyclable items
- Provide a reusable sack for paper and cardboard
- Review of the recycling 'bring-sites' across the district
- Provide wheeled bins for garden waste

## SECTION 2

[Which group\(s\) of people \(if any\) do you think will – or potentially could be – affected by this policy, project, practice or service?](#)

### Protected groups

The protected groups as defined by the Equality Act 2010 are:

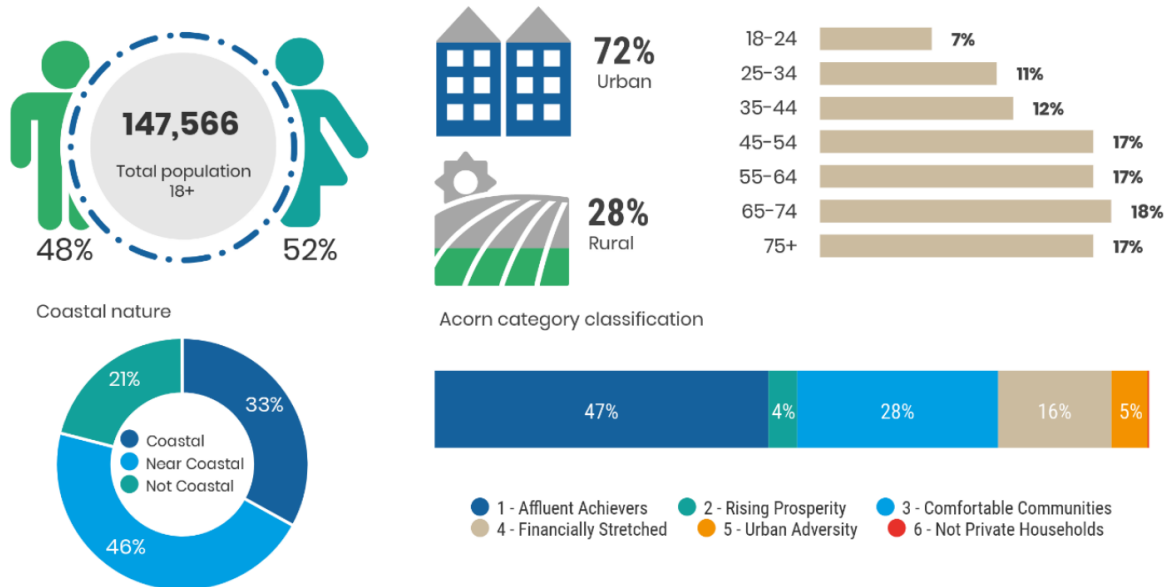
- Age
- Disability
- Sex
- Marriage and Civil Partnerships
- Pregnancy and Maternity
- Race
- Religion and belief
- Sexual Orientation
- Gender reassignment

This Impact Assessment will also consider:

- Other Vulnerable and Disadvantaged groups, e.g. carers, care leavers, homeless, social/economic deprivation, rural isolation.
- Health Inequalities – any preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies

In relation to the protected group(s), what do you know about the people who use your services? What evidence do you have, and how does this compare to the profile of residents?

## AREA PROFILE



Source: MEL Survey for NFDC, 2020.

Waste and recycling collections are one of few council services that are provided to all residents in the District, on a weekly basis.

Research based on the council's existing services by MEL in 2020 found the following:

There were strong relationships between the younger age groups, larger household sizes, those with children and less affluent households setting out more black sacks for general waste. Therefore, generating more waste, this potentially could contain materials that residents want to recycle but can't at present through the collection.

Claimed usage of the box collection for glass was also high, with most using this service every four weeks. Usage increased with the more affluent households and older age groups. These two sub-groups are more likely to buy items in glass as these items are generally more expensive e.g. finest brand ranges etc.

Around a third of residents spoken to use the paid for garden waste collection (although records show that overall only around 18% of households are subscribed to the service). Again, as age and the level of affluence increase, so did usage of the garden waste collection.

Other results showed:

- All residents (100%) said that they used the black sacks for general waste.
- Overall, the majority (99%) of residents claimed to use the clear sack for mixed recycling.
- Overall, almost nine in ten (86%) claimed to use the box to recycle glass, again, results were fairly consistent when comparing methods.

The research undertaken by MEL also included detail around all waste services, including:

- Breakdown of usage of existing services split by subgroups (including age, gender, Acorn category, location type, ward, number of people in the household, and whether children were in the household)
- Satisfaction with existing services (single use sacks, frequency, information, range of materials) split by subgroups
- Motivations for recycling split by subgroups
- Preferences for container types split by subgroups

**Additional information of relevance to this EIA is:**

- In January 2022 there were 508 (0.6% of the total) properties actively receiving an assisted collection. An assisted collection is an on-request service for residents with reduced ability to carry their waste and recycling to the kerbside for collection.
- 7% of respondents to the MEL survey described above were from households of more than 5 people. In addition, an estimated 2.3% of the population were under the age of 2 in 2021. Both statistics are factors which could lead to a household producing larger than average quantities of waste because of a large household and/or children in nappies.
- 13.3% of households in the district have no access to a car/van (Source: 2011 Census)
- 41.8% of households have access to 1 car/van (Source: 2011 Census)
- 19.3% of the New Forest are limited in day-to-day activities. (Source: 2011 Census)
- 97.6% of residents are classed as white, with 2.4% classed as ethnic minorities (Source: 2011 Census)
- Rates of dementia (2018/19) in the New Forest are shown by % of population and split by NHS Primary Care Network below:

PCN	%	Areas included:
Avon Valley	1.27	Ringwood & Fordingbridge
Coastal	1.96	New Milton – Lymington
New Forest	1.5	Lymington, Brockenhurst, Lyndhurst
Totton	1.01	Totton
Waterside	0.9	Hythe & Fawley

*“The Indices of Deprivation (IoD2019) is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019 (IMD2019).”* The seven domains are: Income; Employment; Health Deprivation and Disability; Education, Skills Training; Crime; Barriers to Housing and Services; Living Environment. (Source: English Indices of Deprivation, Ministry of Housing, Comms & Local Gov (2019).

The deprived wards (with the highest IoD2019) within the New Forest are:

- Holbury & North Blackfield
- Furzedown & Hardley
- Totton East
- Totton North
- Milton

- Fernhill
- Bramshaw Copythorne & Minstead

The areas estimated to have highest levels of mental health and wellbeing are (Source: 2022 Census):

- Holbury & North Blackfield
- Milton
- Fernhill
- Furzedown & Hardley
- Pennington
- Ringwood South
- Totton East

**What information and evidence have you reviewed to help inform this assessment? What engagement or consultation has been undertaken?**

**Engagement Response Summary:**

Engagement Type	Summary of Findings
Door to Door Residents Survey	<ul style="list-style-type: none"> <li>• Overall claimed usage of the kerbside services was high with most using the collections at the required frequency</li> <li>• The range of materials that can be recycled seems to be a limitation for residents.</li> <li>• The provision of alternative containers was contentious amongst residents.</li> <li>• Food waste collections were welcomed with around seven in ten residents.</li> <li>• The preferred method of receiving recycling communications was in a hard copy form (leaflet) followed by electronic form (email).</li> </ul>
Resident Engagement Survey (Nov/Dec 2020) <ul style="list-style-type: none"> <li>• Analysis undertaken by external market research agency</li> <li>• 3,863 respondents (mostly residents)</li> <li>• Over 90% read the draft waste strategy summary or full document</li> <li>• Geographical split of respondents was representative of the district based on postcode area</li> </ul>	<ul style="list-style-type: none"> <li>• 74% of respondents selected that Food Waste collections were a good idea</li> <li>• 27% of respondents said that fortnightly collections 'should work well', but 18% would need to consider waste storage and a further 26% would need a container supplied</li> <li>• 50% of respondents supported wheeled bins, however 13% out of this 50% would have to consider where they would store the bin.</li> <li>• 43% of respondents were in favour of recycling improvements, with an additional 22% in favour but with concerns over storage.</li> <li>• 6 in 10 of respondents affected by garden waste changes thought it would be easier to stick with a reusable bag. Those in the East of the district were more likely to support than the West.</li> <li>• 77% of respondents were in favour of the changes to Recycling Banks.</li> </ul>
Town & Parish Councils <ul style="list-style-type: none"> <li>• Responses were submitted by 20 out of 34 Parish and Town Councils</li> </ul>	<ul style="list-style-type: none"> <li>• The main cause for concern was that wheeled bins as a physical object could be unsightly. Most councils stated that this is likely to be where they are left on the highway/curtilage of a</li> </ul>

	<p>property which could happen where storage space is an issue, where properties have long/gravel drives or where there is potential handling issue for elderly or disabled residents</p> <ul style="list-style-type: none"> <li>• Several councils stated that they were in support of food waste collections. Three councils raised concerns about hygiene and smells, especially in the summer months</li> <li>• Two councils both felt strongly that waste minimisation strategies should take precedence, and there should be an increase in education and communications to ensure that less food is wasted. It was also suggested that free or subsidised compost bins should be provided to residents</li> <li>• With regards to the proposed two-phase closure of recycling bank sites, two councils raised concerns that this could lead to an increase in fly tipping.</li> <li>• Five authorities made comments related to the need for increased waste and recycling related communications and education for residents.</li> <li>• There were few direct comments regarding the potential switch to alternate weekly collection (AWC) of recycling and residual waste</li> </ul>
<p>Analysis of Letters &amp; Emails 87 resident emails were analysed, and the key themes and concerns have been summarised</p>	<p>The top concerns noted by residents were:</p> <ul style="list-style-type: none"> <li>• The negative visual impact of wheeled bins</li> <li>• Concerns relating to elderly/disabled residents handling containers</li> <li>• Residents were happy with current service</li> <li>• Concerns relating to the increased cost of the service</li> </ul>
<p>Engagement with local organisations, partners and landowners</p>	<p>The key themes were:</p> <ul style="list-style-type: none"> <li>• The draft waste strategy sets clear case for change</li> <li>• Support for aims and increasing recycling and reducing environmental impact.</li> <li>• Consideration should be given to policies that would minimise the impact of wheeled bins on the New Forest, including colour, design and storage</li> <li>• Consideration should be given to whether policies may impact elsewhere, creating additional costs for partner organisations, for example fly tipping.</li> <li>• Need for clear policy guidance to help minimise potential problems with livestock.</li> <li>• A wish to work more closely with NFDC on waste prevention matters relating to food waste, garden waste and bulky waste; and to look at ways to reduce contaminated recycling</li> </ul>

## SECTION 3

### What is the impact of this activity?

- What negative/disproportionate impacts does the policy, practice, proposal or service have on protected groups?
- In seeking to advance equality and improve access, what positive impacts could this proposal have on the protected groups?

Please consider the potential impact of this activity (during development and implementation) on each of the equality groups outlined below. Please tick one or more impact box below for each Equality Group and explain your rationale. Please note it is possible for the potential impact to be both positive and negative within the same Equality Group and this should be recorded. Remember to consider the impact on staff, public, patients, carers etc. in these Equality Groups.

Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Reasoning for identified impact
Age	✓		✓	<p>Positive impact:</p> <ul style="list-style-type: none"> <li>• Some residents who may find moving existing containers (e.g. a full garden waste sack) to the kerbside difficult, may find new containers (e.g. on wheels) easier to manoeuvre.</li> </ul> <p>Negative impact:</p> <ul style="list-style-type: none"> <li>• Assisted collections will need to continue to be offered. Some elderly people who managed with one container may struggle with an additional container (e.g. food container) if carrying both for some distance.</li> </ul>
Disability	✓		✓	<p>Positive impact:</p> <ul style="list-style-type: none"> <li>• Additional capacity for separately collecting paper and card could benefit anyone who has large quantities of medical waste delivered in recyclable packaging (e.g. home dialysis equipment)</li> <li>• Some residents who may find moving existing containers (e.g. a full garden waste sack) to the kerbside difficult, may find new containers (e.g. on wheels) easier to manoeuvre.</li> </ul> <p>Negative impact:</p> <ul style="list-style-type: none"> <li>• Moving from weekly to fortnightly waste collection could cause storage issues for those who may create additional waste due to disability.</li> <li>• More collection days could negatively impact anyone with memory problems.</li> <li>• Blind or partially sighted may find it difficult to distinguish between the two bins.</li> <li>• Mobility issues / difficulty handling containers could lead to containers being permanently left on the curtilage or pavement.</li> </ul>



Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Reasoning for identified impact
				<ul style="list-style-type: none"> <li>Permanent storage of wheeled bins on the curtilage or pavement could pose risk to wheelchair users or blind or partially sighted residents.</li> </ul>
<b>Sex</b>		✓		Neutral impact
<b>Marriage &amp; Civil Partnerships</b>		✓		Neutral impact
<b>Pregnancy &amp; Maternity</b>			✓	<ul style="list-style-type: none"> <li>Reduced capacity for general waste collection could cause storage problems for those who create additional waste due to children in nappies.</li> </ul>
<b>Race</b> (including Travelling Communities and people of other nationalities)			✓	<ul style="list-style-type: none"> <li>Level of English literacy for those with English as a second language may make introduction of the new service more difficult to understand.</li> </ul>
<b>Religion &amp; Belief</b>		✓		Neutral impact
<b>Sexual Orientation</b>		✓		Neutral impact
<b>Gender Reassignment</b>		✓		Neutral impact
<b>Other Vulnerable and Disadvantaged Groups</b> (e.g., carers, care leavers, homeless, social/ economic deprivation, etc)			✓	<ul style="list-style-type: none"> <li>Those without access to a car would be unable to access a Household Waste Recycling Centre to dispose of excess waste because of the reduction in general waste collection frequency.</li> <li>Anyone relying on a carer to put their containers out may be negatively disadvantaged with more collection containers and possibly more collection days.</li> </ul>
<b>Health Inequalities</b> (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies)			✓	<ul style="list-style-type: none"> <li>Reduction of general waste collection could cause storage problems for those who create additional medical waste due to health issues.</li> <li>Mental health conditions may cause a negative impact because of the change in the service.</li> </ul>

[On the evidence you do have, if there is an adverse impact, what steps will be taken to remove/minimise it?](#)

Risk Identified	Actions required to reduce or eliminate negative impact
<p>Need for Assisted Collections</p> <p>This could be residents who have either a temporary or long-term disability, illness, mobility issue, or injury that prevents them from taking their waste to the edge of their property.</p>	<ul style="list-style-type: none"> <li>• Ensure that all residents that need an assisted collection service are aware of the service available</li> <li>• Continue to provide an assisted collection service to those who already have them.</li> </ul>
<p>Larger Households</p>	<ul style="list-style-type: none"> <li>• We recognise that some larger households may need additional waste or recycling capacity and we would put an application system in place to manage this.</li> </ul>
<p>Bin type/core service options not suitable</p> <ul style="list-style-type: none"> <li>- storage issues</li> <li>- communal waste/recycling facilities</li> <li>- access issues e.g., narrow roads/tracks and distance from highway</li> </ul>	<ul style="list-style-type: none"> <li>• We will develop a clear collection policy, which will set out the criteria to be used when deciding if a particular area or individual household is or isn't suitable for the core service. Surveys will be carried out to identify these areas in detail.</li> <li>• Options have been drawn up, and these will be finalised as part of the service design process.</li> <li>• Our collection policy will clearly advise residents, including where, when and how to display their waste and recycling. Follow up procedures will be put in place to ensure resident adherence.</li> </ul>
<p>Medical waste quantities</p>	<ul style="list-style-type: none"> <li>• We recognise that some larger households may need additional waste or recycling capacity and we would put an application system in place to manage this.</li> </ul>
<p>More collection days causing confusion, or people having difficulty remembering</p>	<ul style="list-style-type: none"> <li>• Design collection services with this mind, to minimise the number of collection days that each household has to remember, e.g. by collecting food waste on the same day as general rubbish.</li> <li>• Consider reminder services, for example text messages or emails</li> <li>• Collection calendars available online for download or paper copy on request</li> <li>• Assisted collections for those with relevant medical conditions, so that people don't have to remember when to put containers out.</li> </ul>
<p>Blind/partially sighted</p>	<ul style="list-style-type: none"> <li>• Look for options where bin can be identified through physical/tactile feature</li> <li>• Leaflets/guides available in alternative formats and read accessible online</li> </ul>
<p>Low level of English literacy</p>	<ul style="list-style-type: none"> <li>• Ensure guides for use of service include pictorial images as much as possible</li> </ul>
<p>No Car</p>	<ul style="list-style-type: none"> <li>• Continue to provide bulky waste collection service.</li> <li>• Continue to offer a free annual bulky waste collection to council tenants.</li> <li>• Offer a "charged for" service for additional waste.</li> </ul>

Risk Identified	Actions required to reduce or eliminate negative impact
Carers placing waste out	<ul style="list-style-type: none"> <li>• Assisted collection or reminder services to help alleviate any additional burden on carers</li> </ul>
Bins left of street, causing hazard to wheelchair users or blind partially sighted residents	<ul style="list-style-type: none"> <li>• Educating residents how and where best to place containers on collection day</li> <li>• Training of collection staff relating to how bins are placed after collection</li> </ul>
Mental health conditions	<ul style="list-style-type: none"> <li>• Promote increased capacity for collection of separated waste and regular collection of food</li> <li>• Consider service delivery of liners for food waste</li> <li>• Staff available to discuss and help demonstrate use of the service if required by residents</li> </ul>

**How will you know if the agreed actions have had the desired results? What monitoring and performance measures/indicators will be reported?**

- Pre implementation property surveying results
- Additional capacity requests
- Assisted collection requests
- Service participation and set out rates
- Customer satisfaction survey

**Who has been consulted with on this EIA, and what were the comments made?**

- Executive Head for Partnership and Operations
- Service Manager – Waste & Transport
- Performance and Projects Officer – Waste & Transport
- Service Manager - Business Improvement
- Business Improvement Project Manager

Feedback from the engagement on the draft waste strategy has been used to inform this EIA. During the implementation period the council will work with community groups to ensure that mitigations, including those described above, are put in place to enable wide participation in the new service.

## Detailed Impact Assessment

### Impact levels

The following key has been used to score the actions within the Waste Strategy:

No Impact	0	This indicates that the strategy/plan is likely to have little or no discernible impact on the community as a whole.
Unknown	?	Unknown impact in relation to the community as a whole or depends on implementation.
Low Impact	+ / -	Similar to no impact but requires some thought to be given. The issues are clear, and the impact is likely to be minimal. However, it may be worth seeking advice before making this judgement. The policy may be positively beneficial or negative for particular groups.
Medium Impact	++ / --	Negative or positive outcome for these specific groups in relation to the community as a whole, for example meeting their needs. The issues are clear and actions are required e.g. to gather more information or to take specific steps to ensure that some groups will not be unfairly discriminated against or disadvantaged.
High Impact	+++ / ---	This applies usually to significant changes in policies and processes. The issues will be clear and the actions to address them need to be specific, time limited and verifiable.

Objective/Action		Age	Sex	Disability	Race	Religion & Belief	Sexual Orientation	Marriage/Civil Partnership	Gender reassignment	Pregnancy/Maternity	Other identified groups	Health Inequalities	Summary of effect
1	Restricting household general waste capacity through wheeled bins	--	0	--	0	0	0	0	0	--	--	--	Reduction in waste capacity could cause issues for those who may create additional waste (e.g., through medical needs/waste or nappies). May be difficult for some older, infirm people to place out wheelie bins. Some residents may find it easier, as the containers will have wheels.
2	Reduce the frequency of residual waste collection to fortnightly	0	0	--	0	0	0	0	0	--	--	--	Moving from weekly to fortnightly waste collection could cause storage issues for those who may create additional waste (e.g., through medical needs/waste or nappies). Could also cause cleanliness concerns for those with mental health conditions such as OCD.
3	Introduce an effective side waste policy	0	0	--	0	0	0	0	0	--	--	--	See Objective 1.
4	Promote home composting	0	0	0	0	0	0	0	0	0	0	0	Partaking or engaging in home composting will be a voluntary additional waste prevention measure and therefore this action should not adversely affect any equality group.
5	Promote food waste reduction campaign	0	0	0	0	0	0	0	0	0	+	0	Partaking or engaging in food waste prevention activities will be a voluntary additional waste prevention measure and therefore this action should not adversely affect any equality group. Reducing food waste can have a financial benefit and therefore may positively impact larger families or low-income groups.
6	Resource and implement our waste prevention plan	0	0	0	0	0	0	0	0	0	0	0	Comprised of all the other outlined objectives/actions.
7	Increase reuse and repair of bulky waste	0	0	0	0	0	0	0	0	0	+	0	Providing support for increased reuse of furniture and other bulky items may directly benefit low-income residents in receipt of support from charities or reuse organisations.
8	Increase textiles reuse	0	0	0	0	0	0	0	0	0	0	0	No direct effect for residents
9	Introduce a separate weekly food waste collection	0	0	0	0	0	0	0	0	0	0	-	The food waste collection service will be collected weekly and will be separate from all other waste. Therefore, handling for those with disabilities or mobility issues should be favourable to the current sack

													collection. Could however cause cleanliness concerns for those with mental health conditions such as OCD.	
10	Increase the range of dry materials that we collect from the kerbside	0	0	0	0	0	0	0	0	0	0	-	-	Increasing the range of materials, means a change for residents, this maybe more difficult for people with memory problems. There should be consideration given to those with low literacy levels.
11	Provide wheeled bins for mixed dry recyclable items	--	0	--	0	0	0	0	0	0	0	--	--	Wheeled bins may be difficult to move for some older residents or residents with a disability of mobility issue. Some residents may find it easier, as the containers will have wheels.
12	Provide a reusable sack for paper and cardboard	-	0	-	0	0	0	0	0	0	0	-	-	For some older residents or residents with disability issue, the accumulation of paper and cardboard over a 2 week period may be heavier than it is for the current weekly collection. Although, the separation of this from other recyclable material will mitigate this.
13	Removal of the recycling bring sites across the district	0	0	0	0	0	0	0	0	0	0	-	-	Families or larger households that create more recycling may currently choose to take some of their recyclable materials to the bring-sites. A clear policy on providing extra recycling capacity at the kerbside will be introduced.
14	Provide wheeled bins for garden waste	-	0	-	0	0	0	0	0	0	0	-	-	Wheeled bins may be difficult to move for some older residents or residents with a disability or mobility issue. It is not expected that wheeled bins would be a greater risk than the current handling of garden waste sacks, that need lifting rather than wheeling, and can weigh up to 20kg.
15	Carry out review of the business waste service	0	0	0	0	0	0	0	0	0	0	0	0	No direct effect for residents