

Equality Impact Assessment Form and Action Table 2017 - 2019

(Expand the boxes as appropriate, please see guidance (www.somerset.gov.uk/impactassessment) to assist with completion)

"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)

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

Procurement of waste and recycling collection contract

Version

5.0

Date

29 March 2019

Section 1 – Description of what is being impact assessed

Under the existing Waste Collection and Recycling Services Contract residual waste is collected from the kerbside every fortnight and materials for recycling including food waste are collected each week. Garden waste collections are available by subscription. Bulky waste collections can be arranged on payment of a charge. Clinical wastes generated in the home are collected separately. Assisted collections are available on request for people who have mobility difficulties or an impairment which means they cannot carry containers to the kerbside. Blocks of flats receive a communal service with shared bins for refuse and a limited range of materials for recycling.

A new contract is being procured to coincide with the expiry of the current contract on 27 March 2020. Initially, the new contract will deliver the same services as currently but following a period of transition refuse collections will be reduced to every 3 weeks and additional materials will be added to weekly dry recycling collections (including plastic tubs and trays, cartons, small electrical items and domestic batteries). Residents of blocks of flats will also be able to recycle additional materials, either by making use of the kerbside service or in large communal containers. These will be emptied when necessary rather than at prescribed frequencies. All other services will remain the same.

As currently, additional refuse capacity will be provided on request to larger households and for the collection of nappies and adult absorbent hygiene products (AHP).

When the new services are rolled out, advance notification packs and service guides (including collection day calendars) will be delivered to households. These communications will let residents know that they should contact customer services for advice and support if they have any difficulties with their collections. Most households will not require additional refuse capacity or assistance, but it will be provided where needed. A collection day "checker" will be available on-line and as a mobile 'phone app. Regular publicity campaigns will raise awareness of the new arrangements and additional staff on the ground will support residents around the time of service changes.

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

All households in all Somerset districts (approximately 258,000). This will include people of all ages, families with children and people with disabilities living in the broad range of property types and communities in Somerset.

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

Staff of Somerset Waste Partnership, and Customer Services teams at partner District Councils and the County Council in Somerset. The current service provider is Kier Recycling CIC but the outcome of the procurement process will result in a new service provider being awarded the contract. Kier's staff, and those of their fleet and maintenance sub-contractor, will transfer to the new service provider.

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

A series of trials of different collection options were undertaken in 2014. The trials were conducted in areas of Taunton Deane that represented the range of urban and rural living in Somerset. The service methodologies that were trialled included the "Recycle More" services that it is intended to move to through the procurement of a new collection contract. Prior to these trials, a focus group, involving residents of Taunton Deane, was held in 2013 to discuss recycling collection container options for the collection of additional materials. Preferences expressed were considered in the design of the trial.

Planning for the 3-weekly refuse collection trial included an assessment of refuse capacity with increased recycling. The outcome of this was that the volume of the additional recycling materials that would be collected more than compensated for the reduction in refuse capacity through 3 weekly collections. The 2012 study of the composition of Somerset's refuse (www.somersetwaste.gov.uk/about/statistics/) reinforced this and found that 50% of refuse could be recycled through current kerbside collection services. The analysis of residual waste composition was repeated in 2018 and this provided further confirmation that existing refuse capacity was sufficient to support 3 weekly collections providing proper use was made of the recycling services.

A survey following the 2014 trial indicated that 81% of respondents on the Recycle More collection system said that the trial services were better than the current services and 86% said that they would prefer for the trial arrangements to be maintained. The survey returns from the trial area covered a wide range of people as follows:

- 5.1% were aged 16-34,
- 18.3% were aged 35-49,
- 33.8% were aged 50-64, and
- 42.8% were 65 or over.
- 18.9% considered themselves to have a disability or long-term health condition.

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

Other Councils that have adopted 3-weekly refuse collections have been contacted, including Powys, which, like Somerset, provides standard 180-litre refuse bins. Powys reported that their new services, which were rolled out in October 2015, are working well, including their arrangements for providing additional capacity for nappy and AHP waste, which are similar to those proposed for Somerset. East Devon DC introduced 3 weekly collections in 2017 and these are also working well.

Other local authority areas that undertake 3 weekly refuse collections include:

- Bury
- Oldham
- Rochdale
- Salford City Council
- Wigan

- Daventry
- Gwynedd
- Conway (4-weekly)
- Powys
- Anglesey
- Blaenau Gwent
- Fife
- Falkirk (4-Weekly)
- North Lanarkshire
- Argyle and Bute
- Clackmannanshire
- East Ayrshire
- East Renfrewshire

A report commissioned by Zero Waste Scotland on 'The potential health impacts of extending the frequency of non-recyclable waste collections' (July 2014), reviewed impacts for a refuse collection service being provided every four weeks. The report concluded that "the availability of simple precautions means the risk for [householders] is little changed from that experienced with existing weekly and fortnightly collections." The precautions included providing a separate, frequent food waste collection (already provided by SWP), increasing food waste capture (achieved previously by refuse bin stickers), encouraging householders to adopt good practice for storage (refuse bins or sacks) and to wash hands and work surfaces after handling waste.

The Chartered Institute of Mastes Management has produced guidelines for the extension of refuse collections beyond two weeks and consider that the following elements should be included in the service:

- Separate food waste collections
- Separate nappy collections (for four weekly), or some form of additional bin provision for qualifying residents
- Good recycling provision in terms of material types, container capacity and frequency – either weekly or fortnightly
- A comprehensive communications strategy to ensure residents understand the system and know where to go if they need further advice or assistance
- Direct engagement with residents during the roll-out phase
- Additional help for large families and those requiring special assistance
- Assistance where a collection has been missed for a valid reason
- Consideration of additional recycling collections during peak periods

The Recycle More service and the proposed implementation plan includes all these elements.

Section 4 – Conclusions drawn about the equalities impact (positive or negative) 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 reduction in refuse collection frequency delivered

through the new contractual arrangements may cause waste storage problems for some households that produce larger quantities of disposable nappies and/or adult hygiene products. These will be mitigated by:

- Encouraging householders to double wrap nappies and AHP and deposit them in their refuse bin or sack.
- Providing advice on reducing waste
- If necessary, providing additional storage capacity (subject to periodic review)
- In exceptional circumstances, provide additional collections every fortnight.

This approach has been successfully adopted in East Devon with only 4 households (of 70,000 properties) requiring additional collections.

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. SWP will provide support to mitigate these impacts and can provide “seagull sacks” to help protect refuse sacks between collections if required. The Recycle More specification makes provision for recycled materials to be collected from a reduced number of containers (provided materials are adequately separated) to alleviate storage issues

Some residents may have difficulty understanding and recalling the new service arrangements, including the three-weekly cycle for refuse collections and the additional materials recycled. The communications plan will include clear notifications, service leaflets and calendars, accessible roadshows and the provision of advice through officer support to mitigate these impacts.

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. This will be reflected in the communications plan and in the support provided during roll out.

All these potential impacts can be mitigated by actions described in greater detail in the table below.

If you have identified any negative impacts you will need to consider how these can be mitigated to either reduce or remove them. In the table below let us know what mitigation you will take. (Please add rows where needed)

Identified issue drawn from your conclusions	Actions needed – can you mitigate the impacts? If you can how will you mitigate the impacts?	Who is responsible for the actions? When will the action be completed?	How will it be monitored? What is the expected outcome from the action?
Age			
<p>New issues or impacts should not arise as a result of the procurement of a new contract.</p> <p>The transition from the current specification to Recycle More with reduced frequency refuse collections may increase existing impacts for some older people, as a higher proportion may have extra medical or AHP waste for disposal</p> <p>Less frequent collection of refuse and especially nappies and adult AHP may cause waste storage problems for some older people.</p> <p>Some older people may have difficulty setting out waste and recycling containers for collection.</p> <p>Some older people may have difficulty understanding and recalling the new service arrangements, including the 3-weekly cycle for refuse collections and the new materials that will be recycled.</p>	<p>Notification packs will be distributed before roll-outs of Recycle More and will carry clear advice, following accessibility guidelines, to attend a roadshow (in accessible locations, such as village halls) or to contact Customer Services (by telephone or email) if there are concerns or likely to be issues with 3 weekly collections of refuse, including the capacity provided. SWP will provide appropriate support for the resident but would normally expect materials to be fully recycled.</p> <p>Service leaflets and collection calendars are to be provided with service leaflets to all households.</p> <p>A on-line search feature for collection arrangements will be introduced onto SWP and partner web-sites and a mobile 'phone app will be available.</p> <p>Weekly clinical waste collections will continue to be provided. AHP waste (not clinical) will continue to be accepted with refuse and additional capacity (stickers for sacks or a bigger bin) provided if needed.</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>Assisted collections are available for all services for customers with mobility difficulties or an impairment that means they cannot carry containers to the edge of the property and there is no one in their household that can help. Containers will be collected from an agreed point on the property, emptied and returned. All collections of clinical waste are treated as assisted collections. Customers receiving assisted collections are amongst the most vulnerable in our society and this will be reflected in the way we communicate with these residents.</p>	<p>SWP will provide notification packs arrange roadshows in advance of service roll outs.</p> <p>SWP will provide service leaflets and collection calendars in advance of service roll outs.</p> <p>SWP will carry out targeted inspections of areas where a previous fortnightly refuse collection has not been made to help identify households that may not have understood or be aware of the new arrangements</p> <p>Inspections targeted by ICDs and other means 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>Monitored by ongoing recording and reporting of number and type of enquiries about waste services.</p> <p>Also, questions to monitor can be included in post roll out surveys and other periodic surveys.</p> <p>Outcomes are is expected to be that most residents, including those in older age groups, understand the service changes and special arrangements are provided where needed.</p>

	<p>Collection crews are trained to provide a high level of customer care but with particular emphasis on those receiving assisted services.</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. Contacts will be given for further advice and assistance.</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>Targeted inspections of areas where a previous fortnightly refuse collection has not been made will be carried out to help identify households that may not have understood or be aware of the new arrangements. Targeted information and full-service details will be provided for these properties, which will also be explained face to face where someone is home. Any issues raised will be addressed. Similar inspections and action will be taken on other initial collection days, when resources allow.</p> <p>In-cab technology will also be used to identify properties struggling with the new arrangements so that additional support can be provided.</p>		
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Disability			
<p>Some people with physical disabilities may have difficulty setting out waste and recycling containers for collection</p> <p>Some people with disabilities who have extra medical or</p>	<p>Some issues identified for those with disabilities will be addressed by the actions proposed above (for age), including roadshows, round inspections, clear literature using images to communicate changes and provision of services to manage AHP waste.</p> <p>Options will be available on request to provide literature in large print, Braille,</p>	<p>SWP will undertake actions as recorded above for age</p>	<p>SWP will monitor demand for additional support and adjust resources to ensure adequate support is available through the course of the roll out.</p> <p>Outcome is expected to be that most</p>

<p>AHP waste may have difficulty storing waste between collections The change in frequency may be harder to manage for people who have issues with Independently managing their affairs or those with a disability on a path to independence Accessible guidance or additional support may be required</p> <p>People with significant visual impairment will not be able to access printed leaflets.</p>	<p>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 will be available should we receive notification that a householder is struggling to understand the new collection frequencies. This would be in the of on-request home visits. We expect the demand for this to be low.</p> <p>SWP will identify disability groups and networks and seek feedback on the impact of proposed changes, and ensure that feedback is considered and built into communication.</p>		<p>residents, including those with a disability, understand the service changes and special arrangements are provided where needed.</p>
<p>Gender Reassignment</p>			
<p>It is possible that those undergoing gender transitioning may generate additional waste that could be difficult to store between collections</p>	<p>Weekly clinical waste collections or additional storage capacity will be provided if necessary.</p>	<p>Information on how to access clinical waste collections and excess waste will be provided in SWP notification packs.</p>	<p>SWP will monitor demand for additional services and capacity, and adjust resources to ensure adequate support is available</p> <p>Outcome is expected to be that most residents undergoing gender reassignment will understand the service changes and that special arrangements are provided where needed.</p>
<p>Marriage and Civil Partnership</p>			
<p>No specific impacts identified.</p>			
<p>Pregnancy and Maternity</p>			
<p>On transition to the 3 weekly service some families using disposable nappies may have difficulty storing refuse between collections</p>	<p>Notification packs distributed before roll-outs of RM will carry clear advice to attend accessible roadshows or to contact Customer Services if there are concerns or likely to be issues with refuse collections. SWP will then agree appropriate support for the resident.</p> <p>Notification packs will also encourage use of reusable washable nappies, by highlighting</p>	<p>SWP Notification packs will be provided in advance of new 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 ongoing recording and reporting of number and type of enquiries about waste services.</p> <p>Outcome is expected to be that most families with children in nappies continue to be able to put these out in standard sized refuse bins provided. If</p>

	<p>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 are provided on request so families with children in disposable nappies can put out additional refuse sacks.</p> <p>With the service changes householders will be encouraged to double wrap nappies and AHP and deposit them in their refuse bin or sack. Where customers find this difficult they can ask SWP for assistance. SWP will provide advice on reducing waste and, if appropriate, may approve additional capacity for recycling and/or refuse. If, additional wheeled bins are provided, they will be recorded, and the request periodically reviewed to ensure the extra capacity is still required, with bins swapped back when the reason for extra allowance no longer applies (probably after 3 years). In exceptional circumstances SWP may agree to provide additional sack collections every fortnight.</p>		<p>additional refuse capacity is needed, then additional arrangements will be available to meet their needs.</p>
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Race (including ethnicity or national origin, colour, nationality and Gypsies and Travellers)

<p>Some people may not sufficiently understand communication materials due to English not being their first language 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>Consultations will take place with the key BME groups in Somerset and advice will be sought on language options to offer. This may vary across the Somerset districts.</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>SWP will offer other language options in notification packs provided in advance of service roll outs.</p>	<p>Monitored by ongoing 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 can understand the new collection arrangements.</p>
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Religion and Belief

No specific impacts identified			
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Sex

No specific impacts identified			
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Sexual Orientation			
No specific impacts identified			
Other (including caring responsibilities, rurality, low income, Military Status etc)			
Caring responsibilities: After the transition to RM, existing impacts may be increased for some people caring for those who have extra medical or AHP waste 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.	Information on how to access clinical waste collections and excess waste will be provided in SWP notification packs.	Monitoring response to contact.
Flats above shops: Some households may not have sufficient space for a full set of recycling containers and to store their refuse between collections. 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.	Additional actions should not be needed, as 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 services will allow more materials to be recycled, including more plastics, so reducing the amount of refuse. This will result in a greater volume of waste materials being collected weekly, rather than less frequently with refuse. Additional arrangements will be considered on a case-by-case basis if a household is not able to manage satisfactorily with all aspects of Recycle More services.	These properties will be identified during round planning in advance of service roll-out by either SWP or the contractor. SWP will provide notification packs including information on how to order additional or replacement recycling containers where required.	Monitored by ongoing recording and reporting of number and type of enquiries about waste services.
Other (including, rurality, low income, Military Status etc): Possible impact on service personnel who are out of the country for the period of the roll out.	SWP will ensure reserve copies of literature is available on demand for those who have missed the initial communications.	SWP	Store of literature retained for 12 months after roll out is completed. New service guides will continue to be available.

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 form part of the reports to SWB to select the preferred bidder to provide waste and recycling collection services in Somerset (including the transition to Recycle More) that will include a requirement for the new service provider to

manage a transition to the Recycle More suite of services.

Earlier versions of this impact assessment were provided in reports to SWB and partner authorities to inform their decisions to adopt Recycle More as the preferred service model for future collections (v3.0) and formed part of the strategy to procure a new waste and recycling collection contract (v4.0).

SWP will maintain this impact assessment as a live document and address new equality issues that are identified through relevant findings from lesson learnt exercises conducted after each roll out phase.

Completed by:	Bruce Carpenter
Date	28 February 2019
Signed off by:	Mickey Green
Date	4 March 2019
To be reviewed by:	Colin Mercer
Review date:	No later than three months after the start of the roll-out of Recycle More collections (ie. September 2020) and within six months of completing the roll-out (April 2020).