

## Appendix 5: Garden Waste

### Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:		Tick ✓	Type of Decision:	Tick ✓
Transformation			Cabinet	✓
Capital			Portfolio Holder	
Service Plan			Corporate Strategic Board	
Other	MTFS	✓	Other	
<b>Title of Project:</b>		Change mixed organic waste collection system with separate collection of food waste and introduce charges for garden waste from 1st October 2015.		
Directorate / Service responsible:		E&E		
Name and job title of lead officer:		Alan Whiting		
Name & contact details of the other persons involved in the assessment:		David Corby, Sajni Durve		
Date of assessment:		14/01/2015		
<b>Stage 1: Overview</b>				
<b>1. What are you trying to do?</b>  (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)		The proposal is to alter the current garden waste recycling collection to a chargeable service. The introduction of charges for garden waste collections will enable protecting of key front line services such as social care. A number of Boroughs currently charge for this service and it is expected that more will follow in the near future etc. The new proposal will change the brown (organic waste) bin system to a separate free collection of food waste and a charged collection for garden waste. Provision of a weekly food collection only to the 74,000 households the container will collect food waste separately for disposal to an AD facility. <b>Before introduction all users will receive a letter detailing the changes. Any language barriers will be mitigated by a well-designed and flexible communications</b>		

	strategy and action plans put in place.				
<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>	Residents / Service Users	✓	Partners		Stakeholders
	Staff		Age	✓	Disability
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity
	Race		Religion or Belief		Sex
	Sexual Orientation		Other		
<b>3. Is the responsibility shared with another directorate, authority or organisation? If so:</b> <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	No.				

## Stage 2: Evidence / Data Collation

**4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.**

**(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)**

Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65. Pensioners on low income may have difficulty financing the new paid-for service. There may be difficulty for older people with mobility impairments and/or impaired vision to travel to the CA site.

**Borough – wide age structure statistics from 2011 census**

Age (including carers of young/older people)

<b>Harrow</b>	<b>2011 Data</b>	<b>2011 %</b>	<b>2011 Rank - National</b>
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

Disability (including carers of disabled people)

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents with mobility and visual impairments.

**Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households**

<b>Harrow</b>	<b>2011</b>	<b>2011</b>	<b>2011</b>	<b>2011</b>
	Data	%	Rank - National	Rank - London
All households	84,268			
<b>Households with:</b>				
No adults in employment with dependent children	3,675	4	116	24
No adults in employment with no dependent children	18,788	22	324	15
Dependent children of all ages	30,670	36	6	5
Dependent children aged 0 - 4	12,435	15	24	13
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A

Gender Reassignment

No data collected. Unlikely to have an adverse disproportionate effect.

Marriage / Civil Partnership

No data collected. Unlikely to have an adverse disproportionate effect.

Pregnancy and Maternity

No full data held however a recent survey indicates that 2% of responders have been pregnant and / or on maternity leave during the past 2 years. There may be difficulty traveling to the CA site.

If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents affected by pregnancy and maternity.

Race

Data collected. Unlikely to have an adverse disproportionate effect.

Religion and Belief	Data collected. Unlikely to have an adverse disproportionate effect.
Sex / Gender	Data collected. Unlikely to have an adverse disproportionate effect.
Sexual Orientation	No data collected. Unlikely to have an adverse disproportionate effect.
Socio Economic	Some residents may not be able to afford the new proposed fees and therefore may need to travel to the CA site to dispose of garden waste. This may prove difficult for those who cannot afford the cost of travelling to the CA site. Furthermore, this may lead to an increased disposal of waste on streets which could lead to fly tipping, increased crime perception, infestations, blocking access and devaluing areas.

5. What consultation have you undertaken on your proposals?			
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
<p>The consultation was carried out over the period 11<sup>th</sup> September 2014 to 8<sup>th</sup> November, 2014.</p> <p>The consultation has given all residents the opportunity to respond.</p>	<p>The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation has had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward:</p> <p>100,000 Take part Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People</p> <p>6000 booklets distributed as part of events</p> <p>Specific web pages relating to the consultation</p>	<p><b>Survey Responses</b></p> <p>Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact:</p> <p>E&amp;E sections include</p> <p><i>Impact on you and your family:</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Switch off some streetlights, or reduce the hours that they are on for</li> </ol> <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Changes to parks maintenance</li> <li>3. Relocation of beat sweepers from secondary shopping centres</li> <li>4. Reduction in grass verge cutting</li> </ol>	<p>Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have their own individual detailed EqIA.</p> <p>Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.</p>

	<p>and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow resulting in 361 face to face in depth conversations</p> <p>Translated documents on the web and in hard copy</p> <p>Easy read of the consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> <li>- Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and</li> <li>- Close or reduce some of the Council's early support services to families, including Children's Centres.</li> </ul> <p><b>Formal Letters</b></p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p><b>Petitions</b></p> <p>No petitions were received in respects of this proposal.</p> <p><b>Harrow Youth Parliament</b></p> <p>The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.</p>	
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<p><b>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</b></p> <p>List the Title of reports / documents and websites here.</p>	<p>None</p>
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### Stage 3: Assessing Potential Disproportionate Impact

**7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?**

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X							
No			X	X	X	X	X	X	X

**YES** - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

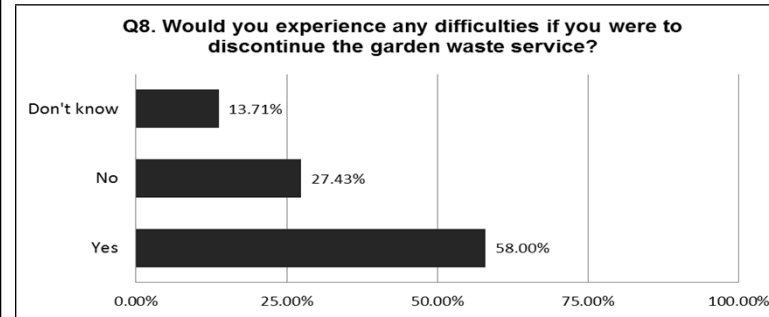
- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

## Stage 4: Collating Additional data / Evidence

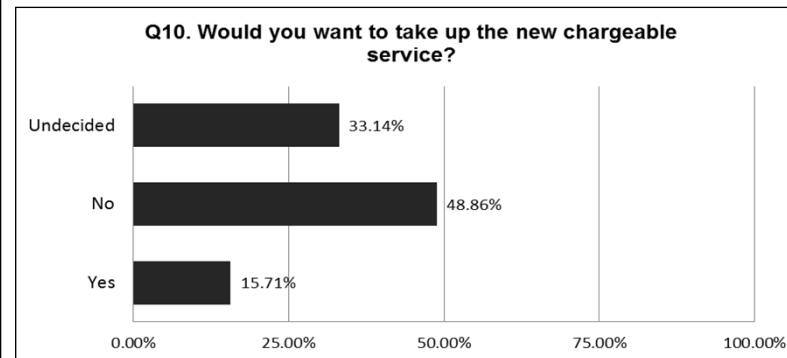
**8.** What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

(include this evidence, including any data, statistics, titles of documents and website links here)

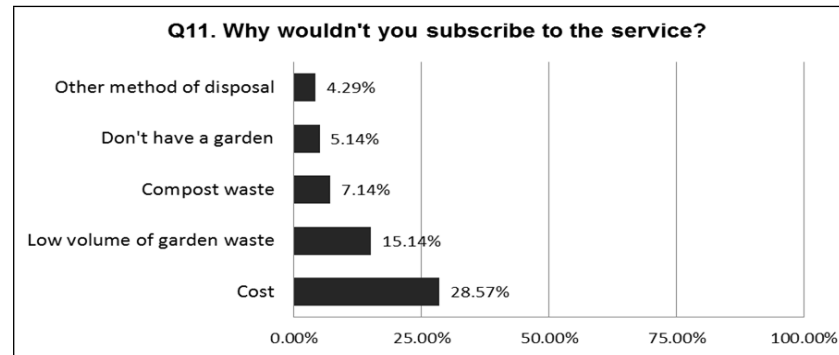
When asked if difficulties would be experienced if we were to discontinue the garden waste service, just over half (58%), said yes. (There is a high proportion of over 65s in this group)



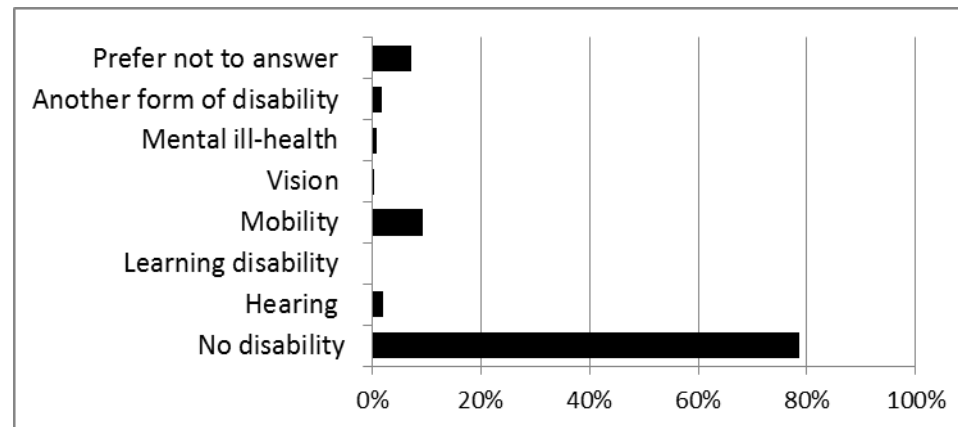
When asked if they would take up the new chargeable service, almost half of the respondents (49%) said no, with a third undecided, and 16% saying yes. (There is a high proportion of under 45s white and asian in the NO group)



When asked why they wouldn't subscribe to this service, cost was the most requested response, made by 29% of the sample. (High proportion of under 45s)



**Are your day-to-day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months?**



This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

**9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?**

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation)
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			with the affected groups, revising your proposals).
<p>Community Champions Housing Tenants</p> <p>Key Community groups</p>	<p>An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date</p> <p>The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.</p>	<p>Over 50% of respondents consider the current service to be good or better.</p> <p>Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating</p> <p>The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scalability of service provision to meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme</p>	<p>Consultation feedback has identified key priorities for any targeted cleaning have directed mitigations</p>

### Stage 5: Assessing Impact and Analysis

**10.** What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)	✓		Pensioners on low income may have difficulty financing the new paid-for service. The only other option would be to drop waste at CA site. This may prove difficult for elderly / vulnerable residents.	Implement concessionary rates for low income retirees.  Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
Disability (including carers of disabled people)	✓		If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents with mobility and visual impairments.	Implement concessionary rates for low income residents with impairments.  Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
Gender Reassignment			No disproportionate adverse impact.	
Marriage and Civil Partnership			No disproportionate adverse impact.	
Pregnancy and Maternity	✓		If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for pregnant residents.	This is a low volume group. Monitor impact

Race			No disproportionate adverse impact.			
Religion or Belief			No disproportionate adverse impact.			
Sex			No disproportionate adverse impact.			
Sexual orientation			No disproportionate adverse impact.			
Socio Economic			There may be a general impact regarding the ability to afford the service. Although age and disability are identified there may be other groups disadvantaged  Change in working practice may have implications to staff working practice	Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA  Undertake Health and Safety and method of work assessment prior to go-live  Ensure correct training is delivered to staff		
<b>11. Cumulative Impact</b> – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?  <i>If yes, which Protected Characteristics could be affected and what is the potential impact?</i>			Yes		No	<b>X</b>
<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?			Yes		No	<b>X</b>

If yes, what is the potential impact and how likely is to happen?

**12.** Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	X	X			X				
No			X	x		X	X	X	X

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**
- If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

**Stage 6: Decision**

**13.** Please indicate which of the following statements best describes the outcome of your EqIA ( ✓ tick one box only)

<b>Outcome 1</b> – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	X
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. <b>(Explain this in 13a below)</b>	
<b>Outcome 4</b> – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

**13a.** If your EqIA is assessed as **outcome 3 or you have ticked 'yes' in Q12**, explain your justification with full reasoning to continue with your proposals.

The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a

concessionary charging scheme and scalability of service provision to meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme

## Stage 7: Improvement Action Plan

**14.** List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Disability Age	Introduction of concessionary pricing	Service take-up	October 2015	Alan Whiting	
Pregnancy and Maternity	Monitor impact to this group	Monitor through the 'Waste Collector' computer system	October 2015	Alan Whiting	
Socio Economic	Review EQIA to clarify policy of introduction of concessionary pricing for the service	Delivery of revised EQIA	April 2015	Dave Corby	

## Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	In house monitoring through Service requests from the 'Waste Collector' computer system and Council complaints.
<b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Internal monitoring



<b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	Full consultation analysis to be completed
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**Stage 9: Public Sector Equality Duty**

**18.** How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
N/a	N/a	N/a

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**

**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Alan Whiting	Signed: (Chair of DETG)	Hanif Islam
Date:	14/01/2015	Date:	
Date EqIA presented at the EqIA Quality Assurance Group	28/01/2015	Signature of ETG Chair	PP Hanif Islam

# Appendix 1

## Consultees

Afghan Association of London (Harrow)  
Association of Senior Muslim Citizens  
Gujarati Arya Association  
Harrow Bengalee Association  
Harrow Iranian Community Association (HICA)  
Harrow Tamil Association  
Indian Association of Harrow  
Nepalese British Community UK  
Pakistan Society of Harrow  
Russian Immigrants Association  
The Harrow African Caribbean Association (HACAS)  
UK Asian Women's Conference (North London)  
Harrow in Business (HiB)  
Canons Community Association  
Harrow Association of Disabled People  
Harrow in Leaf  
Middlesex Association for the Blind  
Harrow Heritage Trust  
North West London Lesbian & Gay Group (NWLLG)  
Harrow Civic Residents' Association (HCRA)  
Hatch End Association  
HFTRA (Harrow Federation of Tenants' & Residents' Associations)  
Harrow Association of Voluntary Service  
Voluntary Action Harrow  
Angolan Civic Communities Alliance (ACCA)  
Harrow  
British Afghan Women's Society  
Harrow Association of Somali Voluntary Organisations (HASVO)  
Harrow Bengalee Association  
Harrow Equalities Centre  
Harrow Somali Cultural & Educational Association  
Jaago Punjabi Women's Group  
Pinner Association

Wealdstone Active Community  
ADHD and Autism Support Harrow  
Mind in Harrow  
National Osteoporosis Society Middlesex Group  
Rethink: Harrow Support Group  
Friends of Bentley Priory Nature Reserve  
Friends of Canons Park  
Friends of West Harrow Park  
Harrow Youth Parliament  
Capable Communities Ltd.  
The Wish Centre  
The Stanmore Society  
Bessborough Cricket Club  
Harrow Rugby Football Club  
Harrow St. Mary's Youth Football Club  
Pinner Cricket Club  
Pinnstars Football Club  
Harrow Mencap  
Harrow Over 50 club  
Harrow Community Transport  
Harrow Centre for Volunteering  
Harrow Volunteer Centre  
Harrow Women's Centre  
Headstone Manor Youth Football Club  
Parkfield Youth Football Club  
Pinner Albion Football Club  
Pinner Jewish Football Club  
Stanmore Football Club  
Age Concern Harrow  
Harrow Mencap  
CAPRA Canons Park Residents Association  
Harrow Nature Conservation Forum  
Harrow St Mary's  
Kenton Town FC  
Parkfield Football Club  
Parkfield Youth FC  
Pinner Albion FC  
St Josephs Youth FC

Stanmore Manor FC  
Three Wishes Exiles  
Venceremos FC  
APB FC  
Lankians CC  
Pinner Challengers CC  
Pinner Cricket Club  
South Harrow CC  
Tamil Union CC  
West Harrow CC  
Yarl CC  
Youth Wing CC  
Culver Bowls Club  
Harrow Weald Bowls Club  
Pinner Bowls Club  
Stanmore Bowls Club  
Pinner & Grammarians Rugby Football Club