



Equality and Fairness Analysis

A supplementary equalities template must be completed for all projects and reports

Report/ project/ policy title	Adaptations to the waste collection service
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Responsible Head of Service	Tim Whelan, Director of Service Delivery Sean Towey, Head of Environment First
Decision Makers (LDC or EBC - Full Council/ Cabinet/ Committee/ Board/ Cabinet Member/ Service Head)	EBC Cabinet
Date signed off by equality officer	18.01.21 (by email)

If you're unsure which template to use or what information to include contact EqualitiesEmail@lewes-eastbourne.gov.uk as soon as possible.

An Equality and Fairness Analysis should be carried out when:

- developing or reviewing strategies, plans, policies and procedures;
- proposing changes to the services delivered or the way these are delivered
- proposing new services, functions, projects or initiatives.

Use this form to demonstrate the ways in which projects, policies and proposals may impact groups protected under the Equality Act 2010, along with any other communities who may be affected. This applies to residents, staff and service users. By thoroughly assessing what we do against the general duty we are able to make better decisions, leading to better outcomes for people who work for us and for people who access our services and facilities. **Decision makers must give due regard to protected groups before the decision is taken.**

We have various engagement groups who can review and provide feedback on your analysis. Contact EqualitiesEmail@lewes-eastbourne.gov.uk if you would like to engage with these groups ahead of completing your analysis.

Our legal obligations: The Public Sector Equality Duty (PSED)

The Council and its companies must, in the exercise of our functions and in our decision making, have due regard to the need to:

1. Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
2. Advance equality of opportunity between people who share a characteristic and those who do not share it;
3. Foster good relations between people who share a characteristic and those who do not share it.

The second aim (advancing equality of opportunity) involves, in particular, having due regard to the need to:

- Remove or minimise disadvantages experienced by people because of their protected characteristics.
- Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

It describes the third aim (fostering good relations) as tackling prejudice and promoting understanding between people who share protected characteristics and those who do not. Compliance with the general equality duty may involve treating some people more favourably than others, providing this is within the law.

Assessing and identifying impact

When completing this form, identify and explore any positive or negative impacts relating to the three general duties listed above.

You need to think about the protected characteristics below as defined in the [Equality Act 2010](#)

- **Age**
- **Disability**
- **Gender reassignment**
- **Marriage and civil partnership**
- **Pregnancy and maternity**
- **Race and ethnicity**
- **Religion, belief and culture**
- **Sex**
- **Sexual orientation**

The Council's Equality and Fairness Policy states that 'we also recognise that **socio-economic status** can be a significant barrier to equality of opportunity'.

Information on key demographic data and an Area Profile covering Equalities can be found on the [East Sussex in Figures' website](#).

Question 1)

What is your proposal and what will change as a result?

Please give an overview of your proposals. What decisions are you seeking?

Currently refuse is collected weekly and recycling materials are collected fortnightly. The proposal seeks to change this so that refuse is collected fortnightly. This would mean that refuse and recycling materials are collected on alternate weeks from April 2021. This is known as alternate weekly collections (AWCs).

Certain areas in the town centre and certain large blocks of flats will continue to receive a weekly waste collection service owing to lack of space for receptacle storage and to meet standards of cleanliness in those locations.

Recycling rates are expected to improve. 'Alternate Weekly Collection (AWC) is designed to encourage participation in recycling and composting by restraining the extent to which recyclable waste can be put into residual waste,' Alternate weekly collections guidance, 2007.

Cheltenham Borough Council (CBC) is the best performing of Eastbourne's 20 'nearest neighbours' (local authorities with similar geographic, demographic and economic characteristics) in terms of recycling. CBC's experience suggests that Eastbourne's recycling rate will increase by 5-7% by moving to alternate weekly collections.

In common with every other local authority currently, we face significant financial challenges as a result of the Covid-19 pandemic. The proposed adaptations to refuse collections represents a more cost-effective service delivery model.

In addition, the council has committed to making the town carbon neutral by 2030. Optimising waste collection operations to reduce fleet mileage will contribute to a lower carbon footprint and improved air quality in Eastbourne.

With a reduction in rounds, the fleet of collection vehicles will be reduced. These changes will contribute to meeting carbon reduction and financial objectives.

Question 2)

- a. Who will be affected by the changes and how? Thinking about groups protected under the Equality Act, what impact do you anticipate for these groups? *Explain your answer on the next page*

		Positive	Negative	Neutral
What will be the impact? Consider who the policy/ decision is intending to benefit and what the expected outcomes are. Assess each characteristic and indicate what impact you anticipate for each group in the space on the next page.	Age		X	
	Disability		X	
	Gender reassignment			X
	Marriage and civil partnership			X
	Maternity and pregnancy			X
	Race			X
	Religion or beliefs			X
	Sex			X
	Sexual orientation			X
Which parts of the Public Sector Equality Duty are most relevant to the policy?	1. Eliminate discrimination, harassment and victimisation		X	
	2. Advance equality of opportunity			X
	3. Foster good relations		X	

Use this space to explain your answer to 2) a. and expand on either the positive or negative impact you have identified for each group, and how the 3 aims may or may not be met.

Weight of household waste bins

Bins may become heavier if refuse is collected fortnightly. Older and disabled people may be less able to move heavier refuse bins.

Consultation findings: This issue was raised by a small number of respondents. Some respondents expressed that AWCs could help because they would put their bin out less frequently.

The low number of respondents raising this issue evidenced the effectiveness of the council's assisted collection scheme; it is being provided to those who need it.

Mitigating factors: Assisted collections will continue to be provided to people who need assistance.

The project aims to increase the amount of waste being recycled. The provisional percentage of household waste currently reused, recycled and composted for 2019/2020 is circa 35%. This suggests there are objects being placed in refuse bins that could be put in recycle bins. The council will continue to educate residents on how to recycle and residents can request additional recycling bins.

Ability to use household waste recycling sites

Disabled people, older people and people on lower incomes are less likely to own or have access to a car than other people. Therefore, they will have less opportunity to take excess refuse to a household waste recycling site.

Household waste recycling sites have pedestrian access. There is one site within Eastbourne. There are four bring sites (for recycling materials) across Eastbourne.

Consultation findings: There were comments made to suggest fly tipping of excess waste would particularly be a problem for people living in flats using communal bins.

Mitigating factors: Certain areas in the town centre and large blocks of flats will continue to receive a weekly refuse collection service owing to lack of space for receptacle storage and to meet standards of cleanliness in those locations.

The operational service will be afforded an element of discretion in setting these boundaries to ensure a flexible response as the service beds in, for example, to address issues of littering.

The council runs a bulky waste collection which is frequently publicised.

Additional recycling bins can be requested free of charge.

Personal waste (non-infectious waste) such as incontinence waste, catheters, stomach pouches, nappies and sanitary products

Emptying household refuse bins fortnightly will increase the amount of personal waste (non-infectious) in the bins at the time of collection. People may have less space for other rubbish in their refuse bin and the personal waste may stay longer in the refuse bin before being collected. This issue may affect disabled people, carers, older people, women and households with children requiring nappies.

Personal waste is considered to be non-infectious waste. Therefore, it is not normally collected within clinical waste collections.

People with health conditions, and those caring for them, not only experience physical difficulties but their mental health can be affected by having to dispose of this waste. There is a risk it will impact on the person's quality of life.

Eastbourne has a higher than national average number of disabled and older residents.

Although a change in collection is unlikely to negatively impact women more than men, it should be noted that some women use menstrual sanitary products.

Consultation findings: This issue was raised in the consultation by older, disabled people, carers, and families with children requiring nappies. Some comments said that waste bins are full each week and AWC's would not be enough for the amount of waste produced. Some comments expressed strong personal negative impacts if AWCs were to be adopted.

Survey responses indicated there is a concern about the smell if collections move to AWCs. Not all people have the dexterity needed to bag waste sufficiently to avoid unpleasant smells from the waste.

Mitigating factors: People requiring more refuse bin capacity to dispose of personal waste can submit a request for a larger or additional household refuse bin. However, some households may not have space to store a larger or additional bin.

If the household feels the infrequency of collections is having a detrimental impact, they can submit a request for clinical waste collection for personal waste.

The waste team will consider requests on a case by case basis and offer a larger or additional bin, or clinical waste collection, if they believe this to be necessary and appropriate.

If AWC is adopted, webpage wording will be changed to explain people disposing of personal waste can submit a request for larger or additional bins, or clinical waste collections. Requests will be considered at the discretion of the waste team.

All requests for larger or additional bins, or clinical waste collections, to dispose of personal waste, whether accepted or declined, will be logged and reviewed each month for the first six months by the waste management team.

Complaints due to requests being declined are to be brought to the attention of the equality officer in addition to being dealt with by the waste team using the Complaints Procedure.

Putting out two standard refuse bins or a clinical waste bag has the potential to exacerbate the negative mental impact because the person may feel different to neighbours.

Wealden DC and Hastings BC were approached to ask if they are aware of issues/complaints from residents since they implemented AWCs. Wealden DC said complaints are rare and residents seem to become used to the changes. They say providing second household bins has been sufficient.

We do not have information to forecast how many people will be affected and to what degree but it is possible AWCs may have a negative impact on some older, disabled people, carers and families with children requiring nappies.

If the AWC proposal is adopted, the impact should be monitored, as set out in the action plan, as potentially a decision to move to AWCs may not support all three aims of the Public Sector Equality Duty, particularly aim 1 and 3.

Volume of waste created by HMOs and larger households

More people living in a household may create more waste. The amount of waste created may exceed bin capacity if AWCs are introduced. This issue could disproportionately impact larger households and people residing in HMOs.

Consultation findings: 95% of households with four or more people said their recycling bin is full each week, this compares to 82% of all respondents. 68% of households with four or more people said their refuse bin was full each week compared to 50% of all respondents. Comments were made expressing the difficulty large households have with the volume of waste and the current frequency of collections.

Mitigating factors: The project aims to increase recycling rates and decrease waste being placed in refuse bins. All households can request additional recycling bins. Households can request a larger or additional refuse bin if there are five or more people permanently living in the household.

Waste created at home by religious and cultural festivals and celebrations

Festivals and celebrations can often create more waste. This may disproportionately impact people of certain religions and beliefs and cultural backgrounds (race).

Consultation findings: When considering the percentage of responses indicating full refuse and/or recycling bins, the results do not show a significant percentage difference between those who identify as having a religion or belief and those who do not and those of differing racial and cultural backgrounds.

Christmas was mentioned as a time people struggled to manage the amount of waste generated within normal collections.

Although the Lewes and Eastbourne Faiths Forum and the Eastbourne Cultural Involvement Group were consulted, there was a low number of responses from certain religious or racial groups.

Mitigating factors: The consultation does not suggest mitigating factors are required.

Less noise and air pollution

AWC's reduce fleet mileage. As a result, there may be less noise and air pollution.

Air pollutants have been linked to a range of adverse health effects, including respiratory infections, cardiovascular diseases and lung cancer. Reduction of air pollution levels will decrease these illnesses¹

Whilst this is beneficial for all people, this is particularly positive for disabled people, older people and children.

Information about the changes available in alternative formats

The council will make information available in alternative formats upon request.

Information about changes to collections will be publicised specifically to the council's community involvement groups including the Disability Involvement Group and Eastbourne's Cultural Involvement Group.

¹ World Health Organisation

Refuse collections for unauthorised Traveller or Gypsy encampments

Unauthorised Traveller and Gypsy encampments may require different waste arrangements. These will be decided on a case by case basis.

b. What mitigations have you identified for each negatively impacted group? If you cannot identify any please explain e.g. a replacement service does not exist/ there is no resource. (There is a space for action planning at the end of this document)

Consider any additional steps the Council could take to enhance (where positive or neutral) or mitigate any negative impacts. Mitigations may include the expansion of one service to cover the restriction of another/ ensuring promotional material is designed with target audience in mind / etc.

See 2a for all mitigations.

Personal waste (non-infectious) disposal

We do not have information to forecast how many people will be affected and to what degree but it is possible AWCs may have a negative impact on some older, disabled people and carers disposing of personal waste and families with children requiring nappies.

Larger or additional bins, or clinical waste collections, may be offered at the discretion of the waste team to households needing to dispose of personal waste.

If the proposal is adopted, these requests and any complaints arising from them are to be monitored, as outlined in the action plan, as potentially a decision to move to AWCs may not support all three aims of the Public Sector Equality Duty, particularly aim 1 and 3.

c. If you believe there are additional groups who may be impacted (e.g people from disadvantaged backgrounds, carers, homeless people, people living in remote locations) please record this here, along with any mitigations you have identified.

The proposal might impact:

- People with lower incomes - They are more likely to live in HMOs and less likely to own, or have access to, a car to transport excess waste to a household waste recycling site (HWRS). However, it is noted HWRS are accessible to pedestrians.
- Larger households - They may generate more waste per household. All households can request additional recycling bins. Households can request a larger or additional refuse bin if there are five or more people permanently living in the household.
- Families with young children - They might need extra refuse bin capacity due to disposing of nappies.

See 2a and b for further details and mitigations.

Question 3)

What information have you used to assess the above anticipated impacts on different groups?

Include any consultation, engagement or research. Explain any data (internal and external), academic research, theories, models you have considered.

A consultation took place between September and December 2020. Over 1500 responses were received. The consultation was publicised widely and specifically sent to the following groups:

Eastbourne Disability Involvement Group

Lewes and Eastbourne Faiths Forum

Eastbourne Seniors Forum

BourneOut LGBT

Eastbourne Cultural Involvement Group

3VA (Voluntary Action)

The consultation received over 1500 responses.

The proposal was presented and commented on by stakeholders at the Eastbourne Disability Involvement Group on 4th November 2020.

Care for the Carers, Wealden DC and Hastings BC were contacted to ask for information regarding the impact of AWCs on those needing to dispose of personal waste.

Data was also evaluated from East Sussex in Figures and WHO

Question 4)

Was there any information you needed but were not able to find? What might be done to remedy this?

Despite the consultation being circulated to Lewes and Eastbourne Faiths Forum and the Eastbourne Cultural Involvement Group there was a low number of responses from certain religious and racial groups.

Next steps: Send your draft to EqualitiesEmail@lewes-eastbourne.gov.uk 5 days ahead of the report deadline. Once signed off the equality officer can send the analysis to the Equality panels, one of which is made up of external representatives and the other is an internal panel. Please indicate if your report is sensitive or confidential.

Question 5)

a. Set out below any comments from members of the Equality Panels

No comments received from the Equality and Fairness Stakeholder Group or the Equality and Fairness Planning Group.

b. Response to feedback. *Describe any changes you have made to your policy / proposals as a result of the feedback. If you are not proposing changes in response to any of the feedback, please explain why.*

Record any actions in the table at the end of this document.

N/A

Executive Summary

Paste this summary into the Equality Analysis section of your report. Give a brief overview of impacts and include any comments received from the Equality Panels.

An Equality & Fairness Analysis has been undertaken for this report. It concluded that while it is hoped that increased recycling, decreased noise and improved air quality will positively impact the local population generally, potentially negative impacts have been identified for those households generating non-infectious personal waste (carers, disabled people, older people, women and households with children requiring nappies). Any negative impacts and experiences by these groups may indicate that aims 1 (Eliminate discrimination, harassment and victimisation) & 3 (Foster good relations) of the PSED may not have been met.

Action Planning

Issue identified	Action to be completed	Lead Officer	Required Resources	Target Date	Measure of Success
The effectiveness of mitigations for households requiring more refuse capacity, or frequency of collection, for the disposal of personal waste (non-infectious)	All requests for additional or larger bins, or clinical waste collections, to dispose of personal waste, whether accepted or declined, will be logged and reviewed each month for the first six months by the waste management team.	Julia Black	Waste administration and management staff time	April to October 2021. Measured after October 2021 if found to be necessary	Waste management team agree with the mitigations being offered on a case by case basis. Few complaints are received and they are not upheld.
Complaints arising from requests for larger or additional refuse bins, or clinical waste collections being declined	Complaints due to requests being declined are to be brought to the attention of the equality officer in addition to being dealt with by the waste team using the Complaints Procedure.	Julia Black	Waste administration and management staff time. Equality officer time.	Ongoing	Few complaints are received and they are not upheld. The equality officer is in agreement with the action taken by the waste team.

Approval	
I confirm I have approved this Analysis and will review the action plan to ensure it is completed within the dates identified	<i>To be signed and dated by Head of Service</i>

Please now send this report to EqualitiesEmail@lewes-eastbourne.gov.uk .