Charnwood Borough Council

Equality Impact Assessment
'Knowing the needs of your customers and employees'

Background

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

Legislation- Equality Duty

As a local authority that provides services to the public, Charnwood Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- ✓ Eliminate discrimination, harassment and victimisation
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex (Gender)
9. Sexual orientation

What is prohibited?

1. Direct Discrimination
2. Indirect Discrimination
3. Harassment
4. Victimisation
5. Discrimination by association
6. Discrimination by perception
7. Pregnancy and maternity discrimination
8. Discrimination arising from disability
9. Failing to make reasonable adjustments

Note: Complete the action plan as you go through the questions

Step 1 – Introductory information

Title of the policy	Increase In Garden Waste Charges
Name of lead officer and others undertaking this assessment	Matthew Bradford – Head of Cleansing and Open Spaces
Date EIA started	8th February 2016
Date EIA completed	

Step 2 – Overview of policy/function being assessed:

Outline: What is the purpose of this policy? (Specify aims and objectives)

The aim of this decision is to increase the charges for the Garden Waste Collection Service over the next 3 years by the following amounts.
2016/17 - £5 per year increase
2017/18 - £3 per year increase
2018/19 - £2 per year increase

The main driver for this change is the need to offset the loss of Recycling Credit incentive payments previously made by Leicestershire County Council from April 2015. The loss in income as a result of this change is £300,000 per annum. The amount of income that is hoped will be raised from the result in increased charges (over the whole 3 year period) will be £300,000 per annum.

The total increase needed over the period, £10 per annum, has been staggered, rather that implemented in one year. It is hoped that this will enable residents to plan for the increase over the 3 year period, rather than having to accommodate a larger increase all in one go. By staggering the increases over the period, rather than implementing the increase in one go, the Council will lose approximately £222,000 in potential revenue. However, this loss is seen as a reasonable measure to meet the needs of our service users and diverse residents.

The collection of Garden Waste is a discretionary service provided by CBC as an enhancement to the statutory residual waste and recycling collections. The service was introduced in 2006 and has always been chargeable. There is a difference in charge between Direct Debit payers and those paying by other methods. This reflects the cheaper transaction costs for Direct Debit payers.

The proposed charges are provided in the table below:

Payment Method	Current Charge 15/16	Revised Charge 16/17	Revised Charge 17/18	Revised Charge 18/19
Direct Debit	£17.00	£22.00	£25.00	£27.00
Other	£26.00	£31.00	£34.00	£36.00

The annual payment is due prior to service commencement and there are no options to spread the cost over the year. This is due to the additional costs of taking the payment in instalments. Providing this option would put additional pressures on the budget and make the need for further price increases highly likely. It would also add additional costs and pressures onto our customers, increasing the costs further for our customers/ residents.

The main impact of the changes will be experienced by those residents with gardens.

Residents who live in flats, apartments or houses without gardens are not considered to be significantly affected by the proposed change.

Alternatives to subscription to the service are:

- Home composting. Subsidised composters are available from Leicestershire County Council for £11
- Taking the garden waste to a Household Waste and Recycling Centre. However, it is recognised that this is not necessarily a viable option for households without the use of a car.
- Reducing Garden Waste e.g. Removing the grass collection box from the mower and leaving the grass to mulch down.

Many authorities charge for the collection of Garden Waste with the average cost nationally thought to be in the £40 per annum region. Across Leicestershire there is a mixed picture with some authorities charging and other providing the service for free. As a result of the withdrawal of Recycling Credits, it is understood that other district/borough councils in the county will be reviewing their charges, or implementing charges where free collections have been made previously. At the time of writing each Council had not ratified their proposals for 16/17 onwards. A summary of existing charges is provided below.

Authority	Current Charge 15/16	Notes
Blaby DC	£27.00	
Harborough District Council	£0.00	£40 per annum charge being introduced from 16/17 (9 month service)
Hinckley and Bosworth BC	£0.00	
Leicester City Council	£30 (March to October)	
Melton BC	£45.96	Due to increase from April 2016. Amount not yet confirmed
North West Leicestershire BC	£0.00	
Oadby and Wigston BC	£0.00	

Alternatives to increasing the charges are as follows:

1. Stop providing the service altogether. This is not considered to be a viable option as many residents value the service that is provided. There are currently 29,000 subscribers. Withdrawing the service would also affect the contractual arrangements with Serco (fleet, KPIs).
2. Absorb the additional cost of providing the service. This is not viable due to general cost pressures on the Council.
3. Make savings in other areas of the service. This is not viable due to other cost pressures on the service and the need to make additional savings/income further to the ones proposed within this report.

What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them?

The change in pricing will impact all existing subscribers and any future subscribers to the service. In making this decision it is accepted that this will have a greater impact upon those

that have the lowest income. Whilst it is acknowledged that low income groups are not considered to be a protected group within the relevant legislation, as a Local Authority we recognise that there are close links and correlations between some protected characteristics/ specific community groups and low income/ deprivation. Therefore, consideration will need to be given to those residents that may be on a low income, due to their circumstances, which are classed as protected under the legislation.

Which groups have been consulted as part of the creation or review of the policy?

There has not been any direct public consultation with regard to this particular decision; however, a wider public consultation has been undertaken as part of the budget setting process. It is understood that residents will not welcome any price increase, and this is to be expected.

Consultation has taken place for the first year of the increase as part of the consultation process for the main budget proposals for 16/17. This process has included Scrutiny, consultation with the Rate Payers Association and with the general public via the website. No responses were received regarding this proposal.

Step 3 – What we already know and where there are gaps

List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.

Data/information such as:

- Consultation
- Previous Equality Impact Assessments
- Demographic information
- Anecdotal and other evidence

- Charnwood Borough Council Equality Strategy 2013 – 2016

http://rearsby1/C11/Equality%20and%20Diversity/Document%20Library/Working%20Group/Equality%20Strategy/Equality%20Strategy%202013-2016%20Final.pdf

- Charnwood Demographic Information 2013

http://www.charnwood.gov.uk/files/documents/charnwood_demographic_information_2013/Charnwood%20Borough%20Council%20Demographic%20Profile%202013.pd

What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list)

It is difficult to estimate who could be potentially impacted by this project. We therefore intend to take all possibilities into consideration when assessing the equality impacts of this increase.

We can utilise information primarily from our demographic profile to ensure that any service users are not adversely impacted by this project.

Step 4 – Do we need to seek the views of others? If so, who?

In light of the answers you have given in Step 2, do you need to consult with specific groups to identify needs / issues? If not please explain why.
No

Step 5 – Assessing the impact

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the individuals or community groups (including what barriers these individuals or groups may face) who identify with any 'protected characteristics' and provide an explanation for your decision (please refer to the general duties on the front page).

	Comments
Age	This increase might impact upon elderly residents who are also on a low income. Some of these residents may live in accommodation that has no garden, or where the gardens are maintained by a third party (flats and sheltered schemes). It is acknowledged that this may not be the case for everyone. The impact is increased for households without the use of a car as this reduces the number of viable alternatives. The overall increase, over the 3 years, is £10 per annum. Although, this has an impact on people with a low income, the increase is considered to be reasonable and proportionate (at less than 20p per week).
Disability **(Physical, visual, hearing, learning disabilities, mental health)**	This increase might impact upon disabled residents who are also on a low income. The impact is increased for households without the use of a car as this reduces the number of viable alternatives. The overall increase, over the 3 years, is £10 per annum. Although, this has an impact on people with a low income, the increase is considered to be reasonable and proportionate (at less than 20p per week).
Gender Reassignment **(Transgender)**	No impacts identified
Race	A lot of our BME residents live in priority neighbourhoods/ more deprived parts of the Borough. Therefore, there could be a slight potential impact upon this protected characteristic.

	Income levels and car-ownership levels are generally lower in priority neighbourhood areas.. This may impact on residents ability to pay for the service and their ability to take garden waste to the local HWRC. The overall increase, over the 3 years, is £10 per annum. Although, this has an impact on people with a low income, the increase is considered to be reasonable and proportionate (at less than 20p per week).
Religion or Belief (Includes no belief)	No impacts identified
Sex (Gender)	No impacts identified
Sexual Orientation	No impacts identified
Other protected groups (Pregnancy & maternity, marriage & civil partnership)	No impacts identified
Other socially excluded groups (carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)	Income levels and car-ownership levels are generally lower in priority neighbourhood areas.. This may impact on residents ability to pay for the service and their ability to take garden waste to the local HWRC.

Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination. Please note: a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. b) Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.
There are no impacts which are believed to be illegal as a result of this assessment. There is a justifiable adverse impact on some groups whose circumstances mean that they are on a low income. It is acknowledged that some elderly, disabled, or BME people may fall into this group if they are in receipt of Pension Credits or Disability Benefits. As the service is not statutory, subscribers under no obligation to pay for the service and are able to choose an alternative disposal/treatment method once their subscription becomes due for renewal. The adverse impact is considered to be reasonable and proportionate. The impact is likely to be small and would not have a significant impact the weekly expenditure of individuals. The

overall increase equates to approximately 20p per week. The alternatives for non-car owning households are limited although alternative ways of managing garden waste do exist and are practiced by many households. Alternative methods are promoted through the CBC website.
Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough Council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).
The increase in charging is considered to have a very minor impact upon a small number of people. This change may impact upon people on low incomes and those in households with no car ownership. These are not protected characteristics under the legislation but we recognise that there are close links and correlations between some protected characteristics/ specific community groups and low income/ deprivation. We will continue to undertake analysis and monitoring to ensure discrimination and adverse impact does not occur.

Step 6- Monitoring, evaluation and review

Are there processes in place to review the findings of this Assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?
The number of subscribers will be monitored regularly to assess the impact upon subscription renewals. The full outcome of this is unlikely to be known until March 2017 as renewal happen throughout the year. Frequent assessments should provide some trend data in the interim period. Ward by ward analysis does not currently exist. It can also be difficult to interpret as subscription rates are linked to housing types, rather than demographic information. For example, areas of high-density housing with smaller gardens will be less inclined to subscribe than areas of low density housing with larger gardens. This may be linked to a lack of need rather than the ability to pay.
How will the recommendations of this assessment be built into wider planning and review processes? e.g. policy reviews, annual plans and use of performance management systems.
Recommendations from the report will be considered in future pricing reviews.

Step 7- Action Plan

Please include any identified concerns/actions/issues in this action plan:
The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan

Reference Number	Action	Responsible Officer	Target Date
1	Monitor renewal rates to assess whether the impact has had an adverse impact upon	Head of Cleansing and	March 2017 for full year

	uptake. See if any conclusions can be drawn from the renewal data.	Open Spaces	data

Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?

	Who needs to know (Please tick)	**How they will be informed** (we have a legal duty to publish EIA's)
Employees	x	Intranet and One Charnwood Newsletter
Service users	x	Website, Charnwood News and by invoice prior to renewal.
Partners and stakeholders	x	Contractor, through regular contract meetings
Others		
To ensure ease of access, what other communication needs/concerns are there?		

Step 9- Conclusion (to be completed and signed by the Service Head)

Please delete as appropriate
I agree with this assessment
If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:
Signed (Service Head): Matt Bradford
Date: 10th February 2016

Please send completed & signed assessment to Suzanne Kinder for publishing.