

Huntingdonshire District Council Equality Impact Assessment (EIA)

Service area	Operations
Date of assessment	10/07/2023
Name of policy/service to be assessed	Garden Waste Subscription Service
Is this a new or existing policy/service?	New service offering for a household garden waste subscription service where collection of all garden waste will be a chargeable service. This is a change from the existing service for households where the first garden bin is provided at no cost and additional garden bins can be requested at a charge of £55 per annum.
Name of manager responsible for new or amended policy/service	Andy Rogan, Heidi Field
Names of people conducting the assessment	Oana Hughineata, Liz Smith
Step 1 – Description of new or amended policy/service	
Describe the aims; objectives and purpose of the new or amended policy/service (include how it fits in to wider aims or strategic objectives).	<p>The change in policy is to propose the introduction of a household garden waste subscription service, which would replace the current non-chargeable collection service from April 2024. The proposal aims to ensure that the garden waste service in Huntingdonshire is self-funding and sustainable in line with the council's carbon reduction targets of net zero by 2040.</p> <p>The Equality Impact Assessment (EIA) aims to:</p> <ul style="list-style-type: none"> . Assess the potential impact of the service on different equality groups. . Identify any potential barriers or disadvantages faced by specific groups. . Ensure that the service is designed and delivered in a manner that promotes equality, inclusivity and accessibility for all residents. <p>The EIA supports the strategic objective of delivering the garden waste subscription service in an equitable manner. It aims to eliminate any unjustified or disproportionate barriers that may hinder certain groups from accessing the service, ensuring equal opportunities for all residents.</p>
The Equality Act 2010 requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, the Council also needs to demonstrate its compliance with the Equality Duty. The Council therefore needs to understand how its	

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decisions and activities impact on different people. An Equality Impact Assessment is the current method by which the Council can assess and keep a record of the impact of new or amended strategies, policies, functions or services.

The council retains these duties even when outsourcing services or providing shared services.

Definition of Adverse Impact - occurs when a decision, practice, or Policy has a disproportionately negative effect on a protected group. Adverse Impact may be unintentional.

Are there any (existing) equality objectives of the new/amended policy/service	To ensure that the household garden waste subscription service policy objectives are designed to promote equality, diversity, and inclusion within the implementation process and does not disproportionately impact any equality group.
Who is intended to benefit from the new/amended policy/service and in what way?	All residents with a private garden
What are the intended outcomes of this new/amended policy/service?	Garden Waste Subscription Service policy outcome is to address the Medium-Term Financial Strategy (MTFS) imperative by offering residents who use the service to fund it through an annual subscription. Therefore, we can ensure that the service remains available to those residents who wish to subscribe and promote behaviour change for our residents in waste minimisation.

Step 2 – Data

<p>What baseline quantitative data (statistics) do you have about the function relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population), relevant to this new/amended policy/service?</p> <p>Huntingdonshire Statistics</p>	<p>Office for National Statistics</p> <p>Key Findings:</p> <p>According to ONS report 2022, Huntingdonshire is the 14th least densely populated of the East of England's 45 local authority areas as of 2021. The 2021 Census estimates that there were 180,800 usual residents living in Huntingdonshire in March 2021. The first release of data provides a breakdown of this into 5-year age groups. The number of people aged 15-64 also increased by 2% to 113,700 and the number of people aged 65 or over increased by 33% to 36,500 at March 2021. The proportion for 2021 estimates of Huntingdonshire's population in each age band, by sex, against the 2011 shows a decline in age ranges numbers (e.g 15-24, 40-49) but increases in others (e.g., 5-9, 25-39). All age groups over fifty have seen an</p>
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increase in both males and females over the ten years from the previous Census.

The proportion of residents who live in a house or bungalow is 88%, with 11.2% living in a flat, maisonette or apartment and less than 1% in a caravan or boat. Those not living in a house or bungalow may not have a garden.

The proportion of residents who live in the social housing rented accommodation sector is 13%.

According to the latest available data, as of 2023, the number of households utilising the garden waste collection service in Huntingdonshire stood at 78,000 properties an estimation of 91% who actively participate.

Cambridgeshire Insights:

- Huntingdonshire is ranked as the 3rd most deprived of the five districts across Cambridgeshire for overall Indices of Multiple Deprivation (IMD Score)

- The Barrier to Housing and Services is domain ranks the lowest (most deprived) out of the domains in Huntingdonshire when ranked against all other local authorities nationally (117/317).

- The Income domain is ranked as the highest (least deprived) in the Local Authority rankings (250/317), closely followed by the Employment (245/317) and Health & Disability domain (242/317).

- Huntingdonshire has 2 LSOAs in the 20% most relatively deprived nationally (H 008A in Huntingdon West and H 008B in Huntingdon North). These were the same two LSOAs that were also in the 20% most relatively deprived nationally in 2015

- There is very little difference between the deprivation domain scores when comparing the urban and rural classified LSOAs in Huntingdonshire. - Within Huntingdonshire, income deprivation affecting older people (IDAOP) is more prevalent than that with children (IDACI), but only by one decile rank (IDAOP =8, IDACI = 7 where 1 is the most deprived).

- 25 LSOAs have become more relatively deprived by 1 decile since 2015, whilst 9 LSOAs in Huntingdonshire have become less relatively deprived by 1 decile nationally.

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What **qualitative data (opinions etc)** do you have on different groups (e.g. comments from previous consumer satisfaction surveys/consultation, feedback exercises, or evidence from other authorities undertaking similar work), relevant to this new/amended policy/service?

The analysis focuses on gathering insights from different councils such as Winchester, Watford, North Herts, East Herts, Hartford, Basingstoke, Eastleigh, Three Rivers who have experienced the introduction of fees for garden waste disposal. The qualitative data provides valuable perspectives on the impact of this policy change on resident's behaviour, attitudes, and overall satisfaction with the service.

Themes and Findings:

Awareness and understanding; From the data received, many participants expressed a lack of awareness regarding the introduction of charges for garden waste collection, indicating inadequate communication from local authorities. Additionally, confusion has been found within the residents regarding collection schedule, payment methods, and acceptable types of garden waste.

Changes in Behaviour: A considerable number of residents reported reducing their waste production or finding separate ways to dispose it such as composting or communal composting facilities. On the other hand, several residents expressed frustration about having to pay for a service they previously received for free.

Financial impact: Residents expressed concerns about financial burden of the new chargeable service.

The findings suggest a need for improved communication strategies to ensure residents are well-informed about policy changes. Furthermore, addressing concerns related to service quality, efficiency, and customer support is crucial for maintaining resident satisfaction. The data also highlights the importance of considering the environmental implications and exploring community-driven initiatives to promote sustainable garden waste management.

Regarding discounts scheme offered by different councils those mentioned above responded with some information provided by email.

- Fewer than 10% of Local Authorities who charge for garden waste collection services also offer a discount/exemption scheme for low-income households

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- Discounts were wildly different and ranging from £5 to 50%
- Generally, discount was made for those residents on Council Tax or housing Benefit.
 - With few exceptions, the Local Authorities did not perform any authentication / validation with regards to discount expect format validation within the form.
 - Local Authorities in this situation had not considered re-validation at the point of renewal
 - Where Local Authorities did perform validation, it completely broke the digital process turning the automation into manual laborious administration and / or contact that was not scalable.
 - No Local Authorities had the capacity to react if a bin was no longer paid for due to the administrative and operational costs associated with removing stickers or bins from routes. It was deemed as simply not worth the effort.
 - DD take up where there was no incentive hit around 50% but this was a gradual increase over years 1-3.
 - DD where there was an incentive rapidly increased DD take up and increased the percentage of DD payments to 70-80%
 - Lead time was at least two weeks (the time between a resident paying for the scheme and the service being in place)
 - Uptake across the Local Authorities providing information showed that the distribution of resident sign up was approximately 50/50 across sign up prior to the service offer commencing (i.e. those residents paying for the service prior to the start of the scheme) and those residents who did not sign up to the scheme upfront, but then did sign up to the service during the course of the year.
 - All but one council charged the full amount to a resident signing up part way through a scheme year.
 - Uptake was consistent. i.e. numbers of resident sign up did not increase (generally) year on year except in small numbers. Generally, within 6 months of scheme launch resident sign up had peaked.

- All Councils offering a Direct Debit renewal payment did so via a digital offering.

Over the summer of 2019, the Watford council undertook two engagement exercises to gauge people’s current perceptions of waste and recycling services. The engagement channels were an online survey (a more traditional approach) and a chatbot survey, through Facebook messenger. This was borne out by the demographics collected through both engagement exercises.

1. ONLINE SURVEY

IN FIELD: 30 July – 10 September 2019
RESPONSES: 398

2. CHATBOT SURVEY (DEPLOYED THROUGH FACEBOOK MESSENGER)

IN FIELD: 27 August – 6 September 2019
RESPONSES: 547

Age profile of respondents

The online survey received the most responses from those in the 35-44 age range (26%), followed by 45 -54 years at 24% whilst the chatbot survey was in the age group 18-30 years.

Sex of respondents

Unexpectedly, there was a very significant difference in the profile of those answering the online survey – with 75% of respondents coming from women. In contrast, the chatbot survey was much more in line with the profile of the Watford population – with 52% male (slightly high) and 48% female (slightly low).

Ethnicity of respondents

Only the online survey asked regarding people’s ethnicity. 79% of respondents were White British, which is a higher percentage than in the population with the next highest category being ‘ White Other’. The EIA, therefore, needs to take into account what is known of the Watford population (see below) in considering ethnicity impacts as these will not necessarily be picked up through the views shared in the survey.

Health of respondents

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15% of respondents declared their day-to-day activities are limited by disability / health related issues. Again, this EIA needs to consider what is known of the Watford population (see below) in considering disability related impacts as these will not necessarily be picked up through the views shared in the survey.

Overall, the council believes that the changes will support an increase in recycling across the borough, which is of benefit to everyone given the acknowledged impact on the environment of items such as single use plastics. The introduction of garden waste subscription is a direct response to the financial challenges the council faces and, by charging those who receive the service, protects it for those who want it but also other service areas which the council is responsible for delivering.

The [Consultation and Engagement Strategy Accessibility Guidance](#) may be helpful when thinking about the potential impact of a policy/service on people with different protected characteristics.

Age – this refers to the protected characteristic of age. A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).

Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic?

Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?

For some services this should include consideration of impact in terms of safeguarding young people.

What evidence do you have for your answer?

Yes

Where people are unable to access the information, via the website or internet due to technological barriers we will support the residents through paper-based communication sent to every household, local media and customer service to provide clear explanations and guidance. Additionally, we will direct them to places such as community groups, libraires or Town and Parish Councils where they can access the information and support. We will consider providing information in various formats such as leaflets, media release to Town and Parish Councils Parish and engaging in outreach activities to reach all age groups effectively

Disability – this refers the protected characteristic of disability. A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Yes

Key considerations when considering the potential impact on individuals with disabilities are:

Accessibility of the Service: Assisted collections are available to people who cannot take their bins out themselves and there is no other person living

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<p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p> <p>What evidence do you have for your answer?</p>	<p>at the household who is able to help. We help to take the bin out for elderly, disabled, infirm or visually impaired persons. To apply for assisted bin collections, residents can visit the HDC website and fill in the application form where possible or contact the operation team to receive the guidance for the process. Additionally, if residents do not require assistance for collection can opt for a smaller wheeled bin.</p> <p>Accessible Communication: Ensure that all information related to the change is communicated in accessible formats such as large print or easy-read formats. Accessible online resources and communication channels will be available, considering the needs of individuals with visual impairments or cognitive disabilities.</p>
<p>Gender reassignment – gender reassignment discrimination occurs when a person is treated differently because they are trans*.</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic? What evidence do you have for your answer?</p> <p>*although the term gender reassignment and transsexual is in the Equality Act 2010, it is accepted that the preferred term is trans.</p>	<p>No</p>
<p>Marriage and civil partnership in the workplace; this refers the protected characteristic of marriage and civil partnership which is a union between a man and a woman or between a same-sex couple. Civil partnership is between partners of the same sex. Discrimination is when a person is treated differently at work because a person is married or in a civil partnership.</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p>	<p>No</p>

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<p>What evidence do you have for your answer?</p>	
<p>Are there concerns that the function could have a differential impact in terms of pregnancy and maternity in the workplace (e.g. pregnant or breast-feeding women). Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p> <p>What evidence do you have for your answer?</p>	<p>No</p>
<p>Race – this refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. Gypsy/Travellers are distinct group within this category</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p> <p>What evidence do you have for your answer?</p>	<p>Yes</p> <p>Communication and Information: We ensure that information about the chargeable green bin collection service is communicated in a culturally sensitive and inclusive manner, addressing potential language barriers and catering to the needs of diverse racial communities. The focus is on promoting equity, fairness, and inclusive service provision for all members of community.</p> <p>Where people are unable to access the application form, via the website or internet, we direct them to places such as community groups or libraires where they can access the internet if applicable. Additionally, customer service can support the residents completing the form and making a secure and payment for the annual fee. (A project to ensure the Council are PCI compliance is currently being scoped)</p>

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<p>Religion and Belief in the workplace - refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief.</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p> <p>What evidence do you have for your answer?</p>	<p>No</p>
<p>Sex - this refers to the protected characteristic of sex which can mean either male or female, or a group of people like men or boys, or women or girls.</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p> <p>What evidence do you have for your answer?</p>	<p>No</p>
<p>Sexual orientation – this relates to whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.</p> <p>Are there concerns that the new policy/service could have a differential impact on individuals with this protected characteristic.</p> <p>Are there any concerns that the policy/service amendments could have differential impact on individuals with this protected characteristic?</p> <p>What evidence do you have for your answer?</p>	<p>No</p>
<p>Are there concerns that the function could have a differential impact on part time/full time employees?</p>	<p>Yes</p>

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<p>What evidence do you have for your answer?</p>	<p>The implementation of a subscription garden waste collection service will reduce our current reliance on short-term agency personnel (which is essential to be able to deliver a non-chargeable service to every household in the district). The normal and expected staff attrition rate, alongside a reduction in agency staff is expected to manage the staffing level to levels required for a subscription service, where only residents who pay for the service receive it.</p> <p>In response to unexpectedly low demand for the subscription garden waste collection service the relocation of both part time/full time HDC employees to other areas of the Operations service that require additional support, would be investigated.</p>
<p>Are there concerns that the function could have a differential impact in terms of specific characteristics of Huntingdonshire e.g. Rural isolation</p>	<p>No</p>

Findings

Where potential for adverse impact has been identified (age, disability, race,), additional support has been put in place to address these potential impacts, to reduce any barriers to accessing the resident advice service e.g., working with partners, assisted collection and information available in different formats.

Recommendations

1. For households on lower incomes, the Council will support residents through the Council Tax Support Scheme, that calculates the contribution required based on the benefits they are in receipt of. A review of this scheme in 2023 will ensure the most financial vulnerable residents are offered the greatest level of Council Tax Support award.
2. Residents in our district who need additional information, advice and guidance can contact the Residents Advice and Information team, who take time to assess the person's personal circumstances and work with them to suggest suitable and sustainable changes and routes to small funding pots that can help to achieve their goals. We will continue to encourage residents on lower incomes to contact the Residents Advice and Information team to explore the ways they may be able to reduce their household expenditure and/or apply for funding if the retention of a garden waste collection service is important in their household to maintain positive physical and mental health.
3. In addition, households on lower incomes will be welcome to share bins under their own informal arrangements but only one household will be responsible for the subscription and adherence to the T&Cs of the scheme.
4. The Council will work directly with District Councillors, Town and Parish Councils to co-design the offer of support for low-income households and local communities through incentives as a way to minimise any negative impact of the change on residents.

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5. The implementation of a robust communication strategy to inform residents about the change, utilising various channels such as social media, websites, leaflets, letters will provide clear and concise information about the service, associated costs and secure payment methods.
6. Provide information, advice and guidance through our Customer Services advisers to support residents in understanding the chargeable service (registration process, payment options) and addressing concerns or questions they may have.
7. Continuously monitor the service, collect and analyse the data to assess the effectiveness of the service and identify any necessary adjustments or improvements.