

Equality Impact Assessment

Please click on headings to find [general guidance](#) or section guidance with an example. You will find supporting information in appendices at the end of the guidance.

When you start to assess your proposal, arrange to meet Tim Greaves, Equality Co-ordinator, for specific guidance. Send the completed form to him for a final check and so that he can publish it on our Vale of Glamorgan equality web pages.

Please also contact Tim Greaves if you need this equality impact assessment form in a different format.

1. [What are you assessing?](#)

The implementation of changes to the collection of waste and recycling in the Vale of Glamorgan including:

Restriction of black bags based on 2 per household per fortnight from 3rd September 2018 with provision for large families and other certain circumstances (such provision to be determined with the assistance of the public via the public consultation exercise) and the implementation of a source separated dry recycling collection service to meet the changes in the EU Waste Framework Directive. From 1 January 2015, waste collection authorities must collect waste paper, metal, plastic and glass separately.

The Council has not yet introduced a revised compliant collection scheme as any changes would not be either technically, environmentally and economically practicable. It has not been economically and practically possible to operate a separate collection system in the absence of a Waste Transfer Station in the Vale and that it is not financially possible being contractually tied to a co-mingled dry recycling processing contract up until March 2018.

2. [Who is responsible?](#)

Name	Bethan Thomas	Job Title	Waste Project Officer
Team	Neighbourhood Services and Transport	Directorate	Environment and Housing Services

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3. When is the assessment being carried out?

Date of start of assessment	26 th March 2018
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4. Describe the proposal?

What is the purpose of the proposal?

To change how residents place their refuse and recycling outside their property for it to be collected. Residents will be limited to 2 black bags of refuse per fortnight and all dry recycling material must be separated into the following bags/caddy before the collection crews will take it away.

Orange bag: Card; White bag: Paper; Blue bag: Tin, Cans, Plastic and Tetrapaks; Grey caddy: Glass

Why do you need to put it in place?

If the Council maintains its existing service it would become non-compliant if there is no strategy to deal with the requirements of the Waste Framework Directive and the Waste (England and Wales) (Amendment) Regulations 2012. The service continues to operate at a £200k deficit and furthermore it is anticipated that Welsh Government grant funding for waste will reduce by £230k from April 2018. Additionally, the processing of the Council's kerbside dry recycling is out to tender and at present there is a favourable gate fee which may significantly increase, due to the current international recycling market. The service at present cannot sustain any further transport savings in the absence of a Waste Transfer Station whilst our waste and recycling is being transported to areas of Cardiff on a daily basis by individual collection vehicles. Therefore to maintain the existing service, a revenue investment of £430k per annum would be required to sufficiently fund the service to the next SRT as well as any potential increases to our dry recycling processing costs.

The Collections Blue Print is the Welsh Assembly Government's preferred service configuration for waste collection from households – in order to comply with the policies, outcomes and targets laid down in Towards Zero Waste, and in order to deliver key financial, economic, social and environmental outcomes. This Blueprint primarily enables local authorities to reduce costs, both through the adoption of the standard service configuration, and through the benefits that can accrue from a consistent approach that enables further costs savings in terms of procurement of boxes, bags, vehicles etc and in the promotion of common advice and instructions to householders.

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Do we need to commit significant resources to it (such as money or staff time)?

It does not require significant resources in terms of money during the planning process but will require management resource (time) to assist with the implementation of the new service and to assist with managing change.

When implementing the required changes there will need to be a sizeable investment in our vehicle fleet and workforce. There will also need to be an extensive education and future potential enforcement action to residents who don't comply with the 2 bag rule regarding their refuse.

There will also be a requirement to invest in containers (bags or boxes) for residents to put their recycling into and a Waste Transfer Station for processing material collected at the kerbside.

What are the intended outcomes of the proposal?

Residents will be required to limit their black bags waste to 2 bags per fortnight and all recycling will be separated before being collected by the crews.

To ensure that the Council remains compliant with current legislation, and that future statutory recycling targets are achieved.

The source separated material will also be a higher quality which will allow the authority to secure sustainable UK markets where possible, when finding end destinations for the material received from the kerbside.

Who does the proposal affect?

The proposal will affect all residents living within the Vale of Glamorgan.

Our service we provide equally to all households throughout the Vale of Glamorgan, and although we do not specifically monitor disability, we will continue to provide an assisted collection service for residents who are unable to present their waste and recycling for collection.

Will the proposal affect how other organisations work?

The proposal will not affect other organisations.

Will the proposal affect how you deliver services?

Yes, residents will have to comply in order to have their material picked up by our collection crews

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Will the proposal impact on other policies or practices?

No proposed impact upon other policies and practices.

Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?

We have not currently identified anything specific that further promotes equality of opportunity but we continue to meet regularly to discuss ways that could assist with identifying the above.

How will you achieve the proposed changes?

The proposed changes will be achieved via the use of effective planning and effective communication with all residents.

Who will deliver the proposal?

The Director of Environment and Housing Services and the Operational Manager of Neighbourhood Services: Operations will deliver the proposal with the assistance from the Waste Project Officer.

How will you know whether you have achieved the proposal's purpose?

The authority will have met its statutory recycling targets of 64% in 2019/20 and 70% in 2024/25 and the service is proven to be economically and environmentally sustainable.

5. [What evidence are you using?](#)

Engagement (with internal and external stakeholders)

A series of roadshows/consultations were held throughout the Vale of Glamorgan, which were advertised in the local newspapers, social media, and the Council's website. The roadshows/consultations gave residents the opportunities to raise any concerns or queries they had regarding the restricted residual changes.

Consultation (with internal and external stakeholders)

The consultation ran from 17 April 2018 until 01 June 2018. The main method for collecting responses was an online survey, which was promoted via the Council's website, social media channels and promoted in the local newspapers.

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Officers also ran a roadshow of drop-in events, where residents could come along to discuss the proposals and raise any concerns or queries. These events took place at various locations, throughout the Vale of Glamorgan and were also advertised on the Council's website, though social media and adverts were placed in local newspapers.

There were 6,066 responses to the consultation via the online survey. This is a 10% response rate of all households in the Vale of Glamorgan. This is the highest response rate recorded for a consultation exercise in recent years.

The first section of the survey asked respondents about themselves. Respondents were asked to provide their postcode, this was to ensure that responses were received from Vale of Glamorgan residents.

Respondents were also asked what type of household they lived in. This was to allow a better understanding of barriers to recycling due to household type. The breakdown of responses is:

- 25.5% Terraced House
- 32.7% Semi-detached house
- 32% Detached house
- 4.1% Flat or apartment block
- 0.1% Caravan
- 5.1% Bungalow; and
- 0.5% Other

Respondents were then asked how many people lived in their household, this was to allow further understanding of the amount of waste each household produces. 53.1% of respondents stated that 1 – 2 people live in their household, 38% of respondents stated that 3 – 4 people live in their household, 8.2% stated 5 – 6 people and 0.7% stated 6+.

The final question in this section asked respondents whether they currently had an assisted collection, this would provide further consideration of respondents needs. 13.9% of respondents confirmed that they have an assisted collection.

The next section asked respondents about their waste and recycling. 61.5% of respondents stated that they put out 2 or fewer black bags of waste per fortnight, on average. 31.9% of respondents put out between 3 – 4 bags per fortnight and 6.6% put out 6 or more bags.

When asked if they would be able to limit their black bag waste to two bags per fortnight 65.8% of respondents said yes.

The 34.2% of respondents who did not feel that they could limit their waste were then asked if there were any items that they could not limit.

When asked to specify what other items could not be limited the vast majority of respondents stated 'non-recyclable packaging'. Some respondents listed textiles and

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other materials that can be recycled at HWRCs. Some stated that due to a lack of space they are unable to recycle and therefore place everything in black bag waste.

The next question asked respondents if the Council were to provide an additional allowance for these items would they then be able to limit their waste to two black bags per fortnight, 49.5% (1,011) of respondents said yes and 50.5% (1,031) said no.

Surprisingly, respondents did not feel that any additional services offered would encourage them to recycle more.

When asked what information would be useful to be shared on the website and social media 39% of respondents made suggestions. The majority of suggestions were around:

- More information on what can and can't be recycled – examples of materials, instructions on which containers to use for which items;
- Collection dates – what can be recycled and when; and
- Changes to services due to bank holidays or severe weather.

Respondents were then asked if there are any barriers to recycling at present. 'Space for containers' was consistently ranked highest amongst barriers to recycling. 'Lack of understanding' is the second barrier listed by most households, followed by 'cost of extra containers'.

The next section asked respondents which containers they would prefer to use to recycle paper, cardboard, glass, metal and plastic going forward. For the majority of materials, with the exception of cardboard, boxes with lids would be preferred over bags. However, the results are very close. For example, 2,784 respondents would prefer a small weighted bag to recycle paper compared with 2,850 who would prefer to use a box.

Next respondents were asked if they were likely to keep separate containers inside their home to the ones that they would put out for collection. As with the previous questions on containers, only a small majority 55.5% said 'yes', compared with 44.5% who said no.

Finally, respondents were asked if they had any other comments or suggestions regarding the proposals. As above, a number of comments raised concerns with storage. Some also suggested that limiting families to two black bags of waste per fortnight could increase fly-tipping. A number of comments were also made regarding providing containers. Some concerns were raised regarding a reduction on recycling due to the changes.

National data and research

We have referred to the EHRC publication 'How Fair is Wales' and its guidance on developing equality policies. We have also looked at examples of other organisations' equality policies.

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Local data and research

We have referred to the data in our annual equality monitoring report.

6. How robust is the evidence?

Does it show what the impact will be (positive and negative)?

We believe that the introduction of restricted residual waste to 2 black bags per fortnight, together with the equality objectives will have a positive impact. We anticipated that the restriction would see a reduction in the tonnage processed of residual waste, and an increase in kerbside recycling which was correct according to reported recycling figures.

We also believe that the introduction of the Collections Blueprint will have a positive impact. We anticipate that the material collected will be a higher quality and will reduce operating costs that are incurred by operating a co-mingled collection service.

Furthermore, we believe that had a neutral impact on the protected characteristic groups.

What are the gaps?

There were no gaps identified, however we will continue to monitor this.

What will you do about this?

We are working with key services to improve on our data collection and analysis each year. We report on this annually in our annual equality monitoring report.

What monitoring data will you collect?

We collected customer complaints and feedback throughout the implementation, which were dealt with accordingly.

How often will you analyse and report on this?

We will do this annually.

Where will you publish monitoring data and reports?

We will publish monitoring data and reports on our website in the same section as our equality impact assessments.

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7. Impact

Is there an impact?

There was no adverse impact at throughout the implementation, however we will continue to monitor this.

If there is no impact, what is the justification for thinking this? Provide evidence.

We have engaged with various groups and consulted with people generally on the changes. We have taken peoples feedback into account so that the needs of protected groups are supported.

If there is likely to be an impact, what is it?

Age

Disability

Gender reassignment, including gender identity (ensure policies explicitly include same-sex couples and use gender neutral language)

Marriage and civil partnership (discrimination only)

Pregnancy and Maternity

Race

Religion and belief

Sex

Sexual orientation (ensure policies explicitly include same-sex couples and use gender neutral language)

Welsh language

Human rights

How do you know?

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Explain this for each of the relevant protected characteristics as identified above.

What can be done to promote a positive impact?

What can be done to lessen the risk of a negative impact?

Explain this for each of the relevant protected characteristics as identified above.

Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)

Will the impact be positive, negative or neutral?

Neutral

8. Monitoring ongoing impact

Date you will monitor progress

September 2019

Measures that you will monitor

Date you will review implemented proposal and its impact

September 2019

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9. Further action as a result of this equality impact assessment

Possible Outcomes	Say which applies
No major change	
Adjust the policy	
Continue the policy	x
Stop and remove the policy	

10. Outcomes and Actions

Recommend actions to senior management team We will continue to update the Revised Waste Management Board members.
Outcome following formal consideration of proposal by senior management team

11. Important Note

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.
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12. Publication

Where will you publish your approved proposal and equality impact assessment? The Vale of Glamorgan Council website. In addition to anywhere you intend to publish your approved proposal and equality impact assessment, you must send a copy to Tim Greaves, Equality Co-ordinator, to publish on the equality pages of the Vale of Glamorgan website.
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13. Authorisation

Approved by (name)	Colin Smith
Job Title (senior manager)	Operational Manager: Neighbourhood Services Operations
Date of approval	
Date of review	