

Tameside & Glossop Strategic Commission Equality Impact (EIA) Form

Subject / Title	Waste policy review	
Team	Department	Directorate
Waste Management	Operations and Neighbourhoods	Place
Start Date		Completion Date
February 2021		November 2021
Project Lead Officer	Garry Parker	
Contract / Commissioning Manager	N/A	
Assistant Director/ Director	Emma Varnam	
EIA Group (lead contact first)	Job title	Service
Garry Parker	Head of Waste Management and Fleet Services	Waste Management
Shamshed Ali	Environmental Services Manager	Waste Management
Simon Brunet	Head of Policy, Performance and Intelligence	Policy, Performance and Intelligence
Daniel Walsh	Policy Officer	Policy, Performance and Intelligence

PART 1 – INITIAL SCREENING

A 'Part 1 – Initial Screening' EIA was completed prior to the commencement of the consultation and pilots, and included in the decision report to Executive Cabinet on 28 July 2021. Item 17 at the link below:

[Agenda for Executive Cabinet on Wednesday, 28th July, 2021, 1.30 pm \(moderngov.co.uk\)](https://www.moderngov.co.uk/agenda/2021-07-28/17)

At that point a full EIA was not required. Now the consultation and pilots have concluded and a decision report regarding implementation is being brought forward a 'Part 2 – Full EIA' has been completed. See below.

PART 2 – FULL EQUALITY IMPACT ASSESSMENT

2a. Summary
Waste Services have prepared a revised Waste Policy for Tameside. The vast majority of the revised Waste Policy is unchanged from the current policy. The three key areas of change are – (1) Collection of blue bins (paper and card) moving from 2-weekly to 3-weekly; (2) Collection of black bins (glass, plastic and cans) moving from 2-weekly to 3-weekly; and (3) the introduction of charges for replacement bins. The revised Waste Policy includes provision for extra bin capacity

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and fee waiver in certain circumstances. It is important to also not some key elements that are unchanged in the revised policy. Namely the frequency of green (landfill) and brown (garden and food) bin collections and the provision of a pull out and return service for those with disabilities or frailties.

A Part 1 – Scoping EIA was completed at the commencement of the project and identified a number of areas of potential impact for further analysis. Data gathering – not least two detailed consultation exercises – has been undertaken to inform this Part 2 – Full EIA.

A number of impacts have been identified and explored through the EIA process. The proposed mitigations put in place are sufficient to ensure additional needs related to protected characteristics are addressed and met.

2b. Issues to Consider

The Part 1 – Scoping EIA identified a number of areas for further exploration to support the Part 2 – Full EIA. Between July and October 2021 further evidence gather was undertake to inform the Part 2 – Full EIA. The most significant part of the evidence base were two detailed consultation exercises which were undertaken to gather feedback and insights from residents on the likely impact of the revised Waste Policy. One consultation was open to all residents of Tameside while the other was focused on the three pilot areas of Haughton Green, Hyde central and Ridge Hill.

CONSULTATION AND ENGAGEMENT

The findings from the two consultations are summarised below. More detail is available at **Appendix 1** (policy consultation) and **Appendix 2** (pilot consultation). To support the trial of the proposals staff from Waste Services undertook on the ground engagement in the pilot areas. They visited 1,893 homes and had 699 detailed doorstep conversations with service users to explain the trial and seek feedback. In addition the head of Waste Services attended the Partnership Engagement Network Conference on 11 October 2021 and the Community Champions on 1 November 2021 to obtain further feedback on the proposals and the revised draft Waste Policy.

Policy consultation

The policy consultation received 1,610 responses. A response rate of 1.5%. Of the 1,610 responses, 1,410 provided narrative comments. These have been reviewed and coded to themes. The top ten themes are listed below. The full list of 42 themes and further analysis is attached at **Appendix 1**.

- Blue bins already filled every two weeks (29.9%)
- Supportive/understanding of proposed changes to black bin collection (20.4%)
- These changes will increase fly-tipping (19.8%)
- Black bins already filled every two weeks (15.5%)
- Blue bins are too small (14.7%)
- Reducing recycling bin capacity is reducing people's ability to recycle (13.3%)
- Larger bins need to be provided if the policy is to go ahead (12.3%)
- Supportive/understanding of proposed changes to blue bin collection (11.3%)

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- You have put up council tax but reduced services (10.1%)
- Respondent identified themselves as being part of a four or more person household (9.7%)

Pilot consultation

The pilot consultation received 1,205 responses. A response rate of 22%. Of the 1,205 responses, 889 provided narrative comments. These have been reviewed and coded to themes. The top ten themes are listed below. The full list of 32 themes and further analysis is attached at **Appendix 2**.

- Supportive/understanding of changes to black bin collection frequency (32.7%)
- Supportive/understanding of changes to blue bin collection frequency (30.0%)
- Blue bin full before 3 weeks (22.7%)
- Brown bins were not emptied on time during pilot (18.7%)
- Black bin full before 3 weeks (15.2%)
- Green bin issues - larger or more frequent (11.2%)
- Having to go to the tip since changes made (9.9%)
- Changes may impact families / larger households more (6.3%)
- Concerns that new scheme will/has increased fly-tipping and rubbish in the area (6.0%)
- More critical that bins must be emptied on time (4.8%)

It is important to note that the area with the lowest response rate to the pilot consultation was Hyde central. This area has a large ethnicity minority community which is a flag for a potential issue of access to information due to language barriers. The Hyde Central area also have more generally negative views about the pilots and bin capacity. This could be linked to the demographics of the area and the greater number of larger, multi-generational households found amongst South East Asian communities.

Notable consultation findings

The comments made in the policy consultation are roughly split – 1 in 10 being wholly positive; 7 in 10 being wholly negative; and 2 in 10 being mixed. Mixed views being neutral observations or comments, or where there are both positive and negative views in the same comment (e.g. support the black bin change to 3-weekly but not the blue bin). Across the three pilot areas in total there is roughly a three way split between wholly positive, wholly negative and mixed views. So those areas that have trialled and experienced the changes have a more positive view than those that haven't.

Hyde Central has more negative responses and Haughton Green more positive. The difference is probably reflective of the average household size with Hyde Central having the largest and Haughton Green the lowest.

The response across the three pilot areas in total is 22%. Hyde Central has the lowest response rate at 14%. Given the demographics of the Hyde Central area with a large South East Asian community there are potentially language barriers to participating in the survey leading to the lower response rate.

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High presentation rates at every collection with the bin full or nearly full are reported in Hyde Central and Ridge Hill. It is likely this reflects the larger average household size in those areas and in Hyde Central the large South East Asian community that has above average numbers of multi-generational households.

Attitudes to recycling are generally similar across all three areas albeit slightly lower in Hyde Central. As with the response rate this could be linked to language barriers to accessing information – e.g. what can be recycled and can't etc.

In terms of the themes summarised from the open text question asking for any other views the top ten are generally similar with a few notable differences. Hyde Central have greater concerns regarding fly-tipping and rubbish on the streets. This could be linked to the proximity to the town centre and the house type of terraces where off-street bin storage is more challenging. Ridge Hill respondents raise more concerns than the other two areas about the change to 3-weekly collection reducing the capacity to recycle. Haughton Green feedback reports issues with bins being emptied on time (in particular brown bins). This is likely to reflect short term operational issues at that time not directly related to the proposed changes.

Both consultations have good demographic representation across the protected characteristics. There are two areas of variation worth noting that are the same in both surveys. Women respondents are over represented and ethnic minority respondents slightly under-represented.

MITIGATIONS

There are three elements of the revised Waste Policy that act as mitigations to some of the concerns identified through the project pre-work and/or are re-iterated in the feedback to the consultation. They are:

- Exceptional circumstances policy (waste disposal / recycling capacity)
- Exemptions policy (charging for replacement bins)
- Assisted collections service (pull out and return).

Exceptional circumstances policy (waste disposal / recycling capacity)

If you live in a large household (6 or more residents) or if you put healthcare waste such as swabs or dressings, incontinence pads or stoma bags in your landfill bin and you need more room to store your waste and recyclable material, please make contact with our Waste Team so we can assess your requirements. To qualify for additional capacity you must be able to demonstrate that you have 6 or more residents permanently residing in the property, or you have healthcare waste as described above. If none of the above applies, but the service user still feels they are unable to cope with the capacity provided, we can provide the service user with a Waste Diary for one week. This will assist an officer with assessing the disposal requirements and areas where assistance can be provided. When the Waste Diary has been completed an officer will visit the applicant's property and perform a waste audit at the applicant's home to determine whether or not extra capacity will be provided.

Exemptions policy (charging)

There will be situations where the charge for a new or replacement bin can be waived, including for example:

- The crew whilst collecting waste has damaged a bin.

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- A bin has fallen into the vehicle and the crew has confirmed this.
- When a bin has been vandalised/damaged/failed and is beyond use.
- Meeting the conditions of the Exceptional Circumstances Policy, where service users meet the requirements for a second green bin.
- An individual named as the occupant/householder, who qualifies for means tested benefits and can evidence that position.
- Justification by a Supervisor or member of the Waste management team.

Assisted collections (pull out and return)

The Council offers assisted collections to residents who are infirm or who cannot put their waste out on the collection day due to a qualifying health condition or disability. This means that waste and recycling crews will pull out the bins from an accessible location so that they can be emptied and then returned. This service is subject to no other able bodied person living at the property. Residents will be required to make an application for this service. In order to reduce abuse of this service the Council will require all applicants to return a medical assessment form signed by their general practitioner with their application form.

SUMMARY

Based on the evidence gathering the following issues and concerns have been identified and assessed for impact:

- Large households – bin capacity.
- Low income – replacement bin charges.
- Frailty / disability – bin weight after 3 weeks.
- Language – access to information.
- Nappies – bin capacity.
- Sanitary and medical products – bin capacity.

2c. Impact/Relevance

Issue: Large households – bin capacity

Protected characteristic groups: Age and ethnicity (multi-generational households)

Impact: Larger households generate more waste. A move to three weekly collections for blue and black bins reduces the households recycling capacity for these waste streams.

Mitigation: Exceptional circumstances policy. Households of 6 or more can apply for additional bins to meet their needs. Households of less than 6 can apply for additional capacity which will be assess through a waste diary.

Issue: Low income – replacement bin charges

Protected characteristic groups: Low income, age and disability.

Impact: Households on low incomes (which are often older households or household contain people with disabilities) may struggle to pay for replacement bins.

Mitigation: Exemptions policy. Households that can evidence they qualify for means tested benefits and require additional bin capacity will not have to pay replacement bin charges.

Issue: Frailty / disability - bin weight after 3 weeks.

Protected characteristic groups: Age and disability.

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Impact: 3-weekly collections will mean more waste in the bin at the time of collection and thus heavier bins that may be difficult for householders who are frail or with a disability to move to the kerbside for collection.

Mitigation: Assisted collections (Pull out and return service). Households with no other able bodied person living there can apply for an assisted collection where the bin crew will take the bin from the property and return it so the householder(s) doesn't have to present on the pavement.

Issue: Language – access to information.

Protected characteristic groups: Ethnicity

Impact: household where English is not the first language or English language skills are limited may struggle to access the required information for any change to the service or ongoing information regarding recycling etc.

Mitigation: Service to work with relevant community groups across Tameside to ensure targeted and enhanced accessible information sharing.

The following two are not directly in scope for this project as no changes to green (landfill) bin collections are proposed. However they were raised in the consultation and as such are noted for completeness. The existing and proposed exceptional circumstances is relevant in both cases.

Issue: Nappies – bin capacity. Note: nappies are disposed of in the green (landfill) bin for which no changes are proposed.

Protected characteristic groups: Age, pregnancy and maternity; breastfeeding.

Impact: Families with children in nappies generate increased waste and may struggle with green (landfill) bin capacity.

Mitigation: Exceptional circumstances policy. Households struggling with bin capacity can apply for additional bins to meet their needs. The application process includes an assessment of need (waste diary) and if additional capacity is provided it may be on a temporary basis where relevant.

Issue: Sanitary / medical products – bin capacity. Note: sanitary products are disposed of in the green (landfill) bin for which no changes are proposed.

Protected characteristic groups: Age and disability.

Impact: Households that put health care waste such as swabs or dressings, incontinence pads or stoma bags in the waste system may struggle with green (landfill) bin capacity.

Mitigation: Exceptional circumstances policy. Households who dispose of healthcare waste can apply for additional capacity which will be provided.

2d. Mitigations (Where you have identified an impact/relevance, what can be done to reduce or mitigate it?)

Large households / bin capacity for waste disposal	Exceptional circumstances policy. Households of 6 or more and/or where the need for additional capacity can be evidenced (waste diary) can have an extra bin provided.
Low income / charging for bins and ability to pay	Exemptions policy. Low income households are exemption from charges.

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Disability & frailty / heavy and heavier bins harder to move	Assisted collections (pull out and return). Households where there is no other able bodied person can apply for an assisted collection where the bin crew will pull out and return the bin to the property.	
Language / ability to access relevant information	Waste Serviced to work with relevant community groups to enhance enhanced and targets information sharing where needed.	
Nappies / capacity for disposal	Out of scope. No changes proposed to the green bin (landfill waste). Exceptional circumstances applies for green bin and extra capacity provided where needed and evidenced.	
Sanitary and medical products / capacity for disposal	Out of scope. No changes proposed to the green bin (landfill waste). Exceptional circumstances applies for green bin and extra capacity provided where needed and evidenced.	
2e. Evidence Sources		
Census 2011		
Mid-Year Population Estimates 2019		
Feedback to the Waste Policy consultation survey		
Feedback to the Waste Pilot consultation survey		
Service records re bin presentation and contamination rates		
2f. Monitoring progress		
Issue / Action	Lead officer	Timescale
Monitor the volume and nature of applications to the exceptional circumstances policy seeking additional waste disposal capacity.	Garry Parker	For 12 months from implementation
Monitor the volume and nature of applications to the exemptions policy seeking the waiver of the charge for additional bins.	Garry Parker	For 12 months from implementation
Monitor the volume and nature of requests for pull out and return service for those with disabilities or frailties.	Garry Parker	For 12 months from implementation
Review and analysis complaints received by the service to identify any relevant trends regarding the impact on protected characteristic groups.	Garry Parker	For 12 months from implementation
While not directly relevant to equalities it is sensible to monitor operational matter to understand wider impact. Key metrics include: <ul style="list-style-type: none"> Recycling rates Tonnages of waste presented in total Tonnages of waste presented by type 	Garry Parker	Ongoing from implementation

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<ul style="list-style-type: none"> • Bin presentation rates • Contaminations rates • Fly-tipping incidents 		
Signature of Contract / Commissioning Manager		Date
Garry Parker		19 November 2021
Signature of Assistant Director / Director		Date
Emma Varnam		19 November 2021