

APPENDIX 4 - FINAL DRAFT EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Integrated Street Cleansing, Waste Collections and Winter Maintenance Services Contract
DEPARTMENT:	Resident Services
TEAM:	Environmental Strategy, Commissioning & Climate Action
LEAD OFFICER:	Georgia Platt
DATE:	09/12/2022

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Street Cleansing, Waste Collections and Winter Maintenance Services currently form part of the Public Realm Contract which comes to an end on 31 March 2023.

The recommissioning of the Integrated Contract was part of the wider Redefining Local Services (RLS) programme, the aim of which has been to design and implement a better, more integrated and flexible local services delivery model that improves the look and feel of Brent's public realm. The overarching RLS delivery model was agreed by Cabinet on 7 February 2022 as a 'specialist contracts delivery model with low level insourcing'. As part of the 'specialist contracts' model, street cleansing, waste collections and winter maintenance services were agreed to be kept as an integrated service on the grounds of economies of scale, operational efficiency and value for money.

The proposed changes to the Integrated Contract include:

Recycling collections

We are proposing giving residents' a separate, reusable sack to separate out mixed paper and card from 'containers' (e.g plastic, tin cans, glass, etc.) which would continue to go into the usual recycling bin. The two material types would be collected on alternating weeks. For example, on Week 1 the sack would be collected, and on Week 2 the recycling bin would be collected. There would still be weekly collections, albeit with a different material collected each week.

We're bringing in-house a team which will be dedicated to educating residents on the proper disposal of their waste and recycling and helping people understand how to do their bit for the environment.

We believe that moving to this approach would save the Council around £1.2m per annum on disposal costs for waste when compared to existing weekly commingled recycling collection (where all recycling goes in one bin).

Small Items Collections Service

We would like to introduce a new, separate free Small Items Collections Service which would enable residents to book a slot to have the following items collected from their property for recycling; Textiles, Small electrical items (WEE), Batteries, Coffee Pod & Paint. This new service would make it easier for residents to correctly recycle the above materials, which should have a positive impact on the environment and our recycling rates.

Assisted collections would not stop and the contractor would continue to help those that need it with their waste.

We believe that this change would help make it easier for residents to do the right thing and recycle, a key outcome that was asked of us during the Let's Talk Climate conversation.

Changes to street cleansing

At present the streets are cleaned on a rota basis, regardless of whether they need to be cleaned or not. We're proposing switching to an intelligence-led approach to cleaning Brent's streets. There would be 6 rapid response teams working across Brent Connect areas (two in Wembley) who would plan their cleaning around reports from the Council's Neighbourhood Managers, Environmental Enforcement officers, councillors and residents. The idea is to tailor street cleaning to meet the particular needs of each neighbourhood and to be flexible enough to respond to changing demands as these arise.

The proposed service can be delivered within contract budget, with significant benefits to the climate emergency agenda, and in accordance with the National Resource and Waste Strategy that provides the future direction of related services and which focusses on reduced waste and promoting recycling and the circular economy.

This assessment will focus on the changes to the recycling process as it has key changes that may impact key equalities groups.

2. Who may be affected by this policy or proposal?

The new contract includes the following proposed service change that would directly impact the existing level of service received by all residents who are on street level households recycling collection rounds in Brent (around 80,000 properties):

- A shift from weekly, commingled (single stream) dry recycling collections to alternate weekly, twin-stream dry recycling collections (whereby containers are collected one week and fibre – i.e. mixed paper and card – are collected the next).

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance. The legal duty is set out at Section 149 of the Equalities Act 2010.

Under s.149, public bodies such as council's must, in the exercise of their functions, have "due regard" to the need to:

- Eliminate unlawful discrimination, harassment and victimisation

- Advance equality of opportunity between people who share a “protected characteristic” and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

The equality duty arises when the council is deciding on how future services are to be delivered.

In addition to the Act, the council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission, and to comply with TUPE regulations relating to the potential transfer of staff as part of any insourcing activity.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age			X
Sex		X	
Ethnicity			X
Disability			X
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity			X
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

**If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.**

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

In conducting this analysis, a number of data sources were considered, primarily to develop an understanding of the borough's demographic profile both now and in the future. This has helped identify potential impacts to protected characteristic groups and areas of expected demand.

A list of sources considered is included below:

Brent Open Data

- Census data 2011 (updated data sets – May 2013 revision)
- Equality profile of Brent 2021
- Community Profiling – Diversity in Brent 2021
- ONS Census Atlas Tool - 2021

A summary of the key findings from this research is included below:

A young, but ageing population –

Brent has a relatively young population. According to the 2021 Census, the median age of the population is 35 compared with 40 across England. However, the population is ageing; projections suggest the number of resident's aged 65 and over could increase by 78% between 2020 – 2041, an additional 33,000 older residents.

Race –

Almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent's largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson's Diversity Index).

Disability –

Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

Pregnancy & maternity -

Brent has relatively high birth rates. There were 4,919 births in Brent in 2019, which equates to 72.6 births per 1000 women aged 15-44 – the 7th highest fertility rate in England. Three quarters of all births in Brent were to mothers born outside the UK – the highest rate in England.

Language -

Around 150 different languages are used in Brent. In 2011, 37% of the Brent population used a main language other than English – the 2nd highest in England. At the time of the Census, the top 100 language groups in Brent were; Gujarati, Polish, Arabic, Portuguese, Tamil, Somali, Romanian, Urdu, Persian/Farsi and Nepalese speakers.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	<p>Negative</p> <ul style="list-style-type: none"> • The proposed changes may have a negative impact on our elderly residents with mobility issues. These resident’s may struggle with separating their recyclable materials and have difficulty moving the sack once it’s full. • Additionally, the changes to the way that recyclables are collected may confuse our elderly residents who are used to all their recyclables being collected at once and they may find it difficult to remember which items will be collected each week. We will ensure that the proposed changes are communicated through various channels and will include pictures to clearly demonstrate the correct process. • It is important to note that assisted collections would not stop and the contractor would continue to help those that need it with their waste. Also, people who find that they have difficulties with new solution due to mobility can request to receive an assisted service and the Council can assess based on their needs. With this service, the residents won’t have to move the sacks to the front of their garden and the contractor can collect it from their front door or the specified location.
DISABILITY	
Details of impacts identified	<p>Negative</p> <ul style="list-style-type: none"> • Around one-in-seven (estimated 46,168) Brent residents have a long-term health condition or disability that limits their day-to-day activities. The changes to the service will negatively impact residents who have a physical disability as they may struggle to separate the recyclables and struggle with the handling of the sack.

	<ul style="list-style-type: none"> • People with learning difficulties may struggle with the change and understanding the changes. • We're bringing in-house a team which will be dedicated to educating residents on the proper disposal of their waste and recycling. We will also distribute pictures that will demonstrate the changes which will be helpful to people with learning difficulties.
ETHNICITY	
Details of impacts identified	<p>Negative</p> <ul style="list-style-type: none"> • Almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent's largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. • Around 150 different languages are used in Brent. In 2011, 37% of the Brent population used a main language other than English – the 2nd highest in England. At the time of the Census, the top 100 language groups in Brent were; Gujarati, Polish, Arabic, Portuguese, Tamil, Somali, Romanian, Urdu, Persian/Farsi and Nepalese speakers. • This change may have a negative impact on this group as they may not understand the proposed changes due to there being a language barrier. To mitigate this impact, we would ensure that the information that residents receive is understandable and we would seek to have the information translated into 5-7 of the most commonly spoken languages in the borough and that we engage with trusted voices in the community to assist with relaying the important changes to their communities.
SEX	
Details of impacts identified	Neutral
SEXUAL ORIENTATION	
Details of impacts identified	Neutral
PREGANCY AND MATERNITY	
Details of impacts identified	<p>Negative</p> <ul style="list-style-type: none"> • According to the Equality Profile (2019), Brent has relatively high birth rates. Also, three quarters of all births in Brent were to mothers born outside the UK. These changes will have a negative impact on this group as they may have mobility issues when handling the sack, especially if the sack is heavy. Additionally, there may be a language barrier and the mothers

	who were born outside of the UK may have English as an additional language and not understand the changes to the service.
RELIGION OR BELIEF	
Details of impacts identified	Neutral
GENDER REASSIGNMENT	
Details of impacts identified	Neutral
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Neutral
SOCIO-ECONOMIC BACKGROUND	
Details of impacts identified	<p>Negative</p> <ul style="list-style-type: none"> • Although this is not a traditional category, it is relevant to our proposal and it is important to consider housing types and the impact the change will have on households that are occupied with 4 persons or more. We have the third largest household size in the whole of England and Wales. (2011 census category). A high household size may be impacted as the current capacity of the sack may not be able to store all of their recyclables. To mitigate this, we are exploring the option of providing additional sacks on request to those who struggle with the capacity in addition to reviewing the current capacity of the sack. • Persons living in flats, or smaller houses may struggle to find the space in their homes to safely store the sack. It is possible for the sacks to be stored outside of their flats which would mean the sack doesn't negatively impact the space that they currently have inside their homes.

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes. We consulted with the general public and informed them of our proposed changes in three main ways:

- Paper questionnaires delivered to the households of residents known to be in receipt of an Assisted Collections service.
- Online surveys via the Council's citizen lab portal which is accessible to registered users
- Public roadshows in targeted locations throughout the borough delivered by the Council's Neighbourhood Managers

We understood the importance of capturing the views of Assisted collections customers due to the nature of the proposed changes to recycling collections which requires additional input from the residents to separate their recyclable material at source. 44% of residents who receive assisted collections agreed with the proposed service changes to recycling collections, compared to 37.5% who disagreed.

5. Please detail any areas identified as requiring further data or detailed analysis.

This analysis is based on the most up to date data which is the 2011 Census as the majority of the data from the 2021 Census is not available. Some of the more detailed information won't be available until January 2023 and it may be possible to conduct further analysis once this information is ready.

6. If, following your action plan, people impacts will or may remain, please explain how these can be justified?

The solution of the proposed service provides benefits overall. It will be delivered in accordance with the National Resource and Waste Strategy that provides the future direction of related services and which focusses on reduced waste and promoting recycling and the circular economy. With the new service, we should see an improvement on recycling volumes and a reduction in contamination rates, with additional income received from higher quality materials.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

We have conducted an 8-week trial which has been assessed to be successful. We will be undertaking a survey with residents participating in the trial to understand their experiences and whether there are any further ways to improve the design of the new service.

We will monitor and engage with residents as the service is rolled out to keep track of people having difficulties or struggling. Furthermore, we will provide extra support to those groups who require it through our new in house Education, Communications and Outreach team. We will encourage constant feedback and gather data and intelligence on how the service is being rolled out.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

In conclusion, there are several groups who will be negatively impacted by the change. However, the following mitigations should alleviate the negative impacts:

Assisted Collections Service

The Assisted collections service will still be in operation in the new service. With this service, the residents won't have to move the sacks to the front of their garden and the contractor can collect it from their front door or the specified location. This will support those with mobility issues.

Changes to the design of the sack

We will discuss a solution with the supplier which makes the sacks easier to use. For example, having hangars at the side of the bin to allow residents to wheel it. This also would support residents with mobility issues.

Targeted communication campaign

To ensure that the changes are communicated properly across the borough we will deliver an effective, targeted communication campaign that clearly details the changes. It is important to note that we have community champions across the borough who would be able to engage with and communicate the proposed changes to individuals who have English as an additional language. The community champions would be able to support with translating the information to their groups. We will also send flyers which includes pictures that clearly demonstrate the new recycling collection process which will be helpful to all residents and minimise confusion.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Conduct a survey once the new service has been rolled out			
Ensure that we have engaged with residents who receive assisted collections to receive their feedback on the new process			
Steps will be taken to ensure effective and timely monitoring and evaluation of the service in order to continually identify potential improvements			

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Georgia Platt
REVIEWING OFFICER:	Angela Chaudhry
HEAD OF SERVICE:	Oliver Myers