

# EQUALITY IMPACT ASSESSMENT - KITCHEN FOOD WASTE COLLECTIONS

## 1. Purpose of the Equality Impact Assessment

To consider the findings of an Equality Impact Assessment (EIA) of changes proposed to the collection arrangements for kitchen and residual waste and to agree recommendations arising from this assessment.

## 2. Background

EIA's are part of the process the Council has adopted to comply with its statutory duties regarding Race Equality, Disability Equality and Gender Equality.

EIA's are used by the Council as the method of addressing inequality in its policies and practices on the grounds of race, disability, gender, age, the Welsh language, religion and belief, and sexual orientation.

## 3. Background to the Assessment

The Welsh Assembly Government's Wales Waste Strategy 'Towards Zero Waste 2010' specifies key objectives in moving Wales to a Zero Waste Country by 2050.

The Strategy requires that The Vale of Glamorgan Council:

Recycle Municipal Waste arising in its area as follows:

- 50% by 2012 / 2013
- 58% by 2015 / 2016
- 64% by 2019 / 2020
- 70% by 2024 / 2025

The targets include diverting food waste from landfill.

Having stabilised the capture of recyclable material by its existing weekly alternative material (Week 1 Paper, Cans and Glass: Week 2 Cardboard and Plastic) at between 24% and 26% and analysed the

results of a municipal waste composition study undertaken in 2009 / 2010, it was evident that the Council needed to extract even more material from the household waste stream.

As kitchen waste comprises approximately 34% of the household waste it was this fraction that needed to be targeted in order to increase recycling / composting. Further, the Council's specific Waste Management Grant now includes an annual element of circa £800k which is hypothecated for kitchen waste.

#### **4. The Equality Impact Assessment Group**

This EIA was carried out by the Council's Waste Management and Cleansing Section with the assistance of the Council's Equalities Team.

#### **5. Aims and Objectives of Assessment Project**

The aim is to introduce kerbside kitchen food waste collections and fortnightly residual waste collection to all properties in the Vale of Glamorgan.

The objectives are as follows:

- (i) To enable the Council to meet the increasing National recycling and composting targets;
- (ii) To meet the demands of Vale of Glamorgan residents to have the opportunity to recycle a wide range of material;
- (iii) To further reduce overall levels of residual waste sent to landfill.

#### **6. The Process**

The process will be as follows:

- Weekly collection of food waste; All households on the service will be provided with a small kitchen 7 litre (7L) capacity caddy (and a roll of 52 bio-bag liners to fit the 7L caddy) and a 23L kerbside caddy. Both caddies feature plastic handles and are of a cubic capacity sufficient to avoid excess carrying weight.
- Fortnightly collection of residual black bag refuse;

- Weekly collection of recycling with paper, can, glass Week 1 and plastic and cardboard Week 2;
- Fortnightly collection of green waste on Week 2 between April and November;
- Bio-bags for the kitchen waste will be delivered to all customers with stocks replenished by customers indicating their bio-bag requirements by tying or wrapping a piece of cloth or bio-bag around the handle of their kerbside caddy.

## **7. Assessment of Relevance for Equalities Groups and Human Rights Act**

The level of reference (e.g. low / medium / high) of the proposed changes is as follows:

### **All Equalities Groups - Low**

The new waste recycling composting service has limited scope to adversely affect any particular group of people. Where it does impact on particular groups, service dispensations such as assisted collections and provision of storage containers, ensure the services remain accessible to all.

### **Ethnicity - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of race and ethnicity. There is a limited potential for adverse impact in implementation of the arrangement if Vale of Glamorgan residents are less aware of the process and / or have language issues which prevent them understanding or accessing the new service.

### **Age - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of age. The service will be provided to all age groups. There is a limited potential for adverse affect on the elderly but there already exists a range of service dispensations, such as assisted collection to ensure that collection services remain accessible to older people and that they are not disadvantaged.

### **Disability - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of disability. There is a limited potential for adverse affect on the disabled but there already exists a range of service dispensations by way of reasonable adjustments, such as assisted collection, to ensure that collection services remain accessible to those that are less able such that they are not disadvantaged.

### **Gender - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of gender.

### **Literacy - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of literacy. Whilst information on how to use the service is provided in written form, arrangements are also in place for Waste Awareness Officers to advise all residents verbally of the service changes via our 'door stepping' procedures. Pictorial explanations have been used in publicity materials, and all public documents are produced in an easy read format.

### **Sexual Orientation - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of sexual orientation.

### **Welsh Language – Low**

The new waste and recycling/composting service will not directly discriminate on the grounds of Welsh language.

### **Faith - Low**

The new waste and recycling / composting service will not directly discriminate on the grounds of faith or religion.

### **The Human Rights Act 1998 (HRA)**

The new waste and recycling / composting service will not directly affect an individual's human rights.

## **8. The Focus of the Equalities Impact Assessment**

On the basis of the above, and in accordance with relevant equalities legislation (Race Relations Act, Disability Discrimination Act, Sex Discrimination Act, Equal Pay Act, Human Rights Act) the proposed new collection service does not directly discriminate against any particular group.

Therefore the review will focus on the extent to which the new collection arrangements may indirectly discriminate against certain groups.

## **9. Data and Research Assessment**

In carrying out this EIA, the following methods and data sources were used to examine the impact of the new collection service upon the various equalities groups.

### **Vale of Glamorgan Citizen's Panel**

The Citizen's Panel were encouraged to complete a Kitchen Waste Recycling Trial Survey. The finding showed that there were no concerns on equalities.

### **Kitchen Waste Recycling Focus Group**

Two Focus Groups sessions were held with positive feedback about the new scheme obtained. The sessions were as follows:

- (i) Afternoon on Saturday, 7<sup>th</sup> March at Lower Penarth Community Centre and;
- (ii) Evening of Thursday, 12<sup>th</sup> March at Highlight Park Community Centre.

There were no equality issues raised by any Focus Group Members who were generally positive about the environmental benefits of the proposed new collection services.

### **Sharing Good Practice / Learning from Experience**

Waste Management staff have learnt from the experiences of other Local Authorities in respect to the introduction of food waste and alternate weeks residual household waste collections. This learning included a site visit to Carmarthenshire County Council to view their

service where our officers and elected Members challenged representatives of Carmarthenshire County Council on their experiences having implemented a similar scheme.

### **Waste Composition Analysis**

The composition analysis carried out and funded by WAG showed that a typical Vale of Glamorgan resident generated 34% material suitable for composting (i.e. food and garden waste).

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## **10. Consultation**

The new service has been subject to widespread consultation since being trialled in 2008. This also included residents, users, frontline staff, Council officers and Members.

### **Consultation with Residents**

- (i) Kerbside Recycling Survey (collect food scraps requested by 3% of respondents);
- (ii) Kitchen Waste Recycling users Survey 2008 / 9 (overall positive rating (excellent / good) 98%);
- (iii) Kitchen Waste Public Focus Groups
  - (a) Saturday afternoon 7<sup>th</sup> March, 2009 Lower Penarth Community Centre;
  - (b) Thursday evening 12<sup>th</sup> March, 2009 Highlight Park Community Centre;
- (iv) Public Roadshow:
  - (a) Cowbridge Town Hall Car Park;
  - (b) Kings Square, Barry 30<sup>th</sup> January, 2010;
  - (c) The Promenade, Barry Island 8<sup>th</sup> June, 2010;
  - (d) The Pier Promenade, Penarth 26<sup>th</sup> August, 2010;
  - (e) Kings Square, Barry 18<sup>th</sup> September, 2010;

- (f) Vale on the Road Event Kings Square, 11<sup>th</sup> September, 2010;
- (g) Vale on the Road Event in Llantwit Major Comprehensive School evening 15<sup>th</sup> September, 2010;
- (h) Vale on the Road Event Paget Building, Penarth 25<sup>th</sup> September, 2010.
- (v) Regular raising awareness and promotion articles in Council's publication and local media 2008 - 2010;
- (vi) Informal Cabinet briefings;
- (vii) Door stepping all properties affected by the new collection service together with Information Leaflet;
- (viii) Direct mailing to individual householders affected by the new collections arrangements at the beginning of each roll out:
  - (a) Details of collection arrangements;
  - (b) Detailed Information Leaflets;
  - (c) Calendar providing collection dates.
- (vx) Specific consultation with the following organisations:
  - (a) Race Equality First;
  - (b) Cardiff & Vale Coalition of Disabled People;
  - (c) Stonewall Cymru;
  - (d) Age Concern;
  - (e) Wales Assembly of Women (Vale Branch) and
  - (f) Muslim Welfare Association.

### **Consultation with Frontline Staff**

Existing operational staff were provided with information on the new collection arrangement in 2008. As part of this process they were

invited to voice their opinions, concerns and ideas from their experiences of undertaking existing service arrangements.

Specific Consultation was also carried out with staff within the Council's OneVale Contact Centre who would be the first point of contact with affected householders.

Ideas and concerns from these group sessions were invaluable and formed a significant element of the considerations when devising the operational aspects of new collection rounds.

## **11. Equalities Impact Assessment Findings**

It has already been identified in sections 7 and 8 that the new collection service will not directly discriminate against any particular equalities group since the service will be provided to all groups within the community regardless of ethnical, age, gender, disability or sexual orientation. However, the new service may have indirect discriminating impacts dependant upon:

- (i) whether they affect some groups positively more than others and if so whether these impacts are proportionate to need;
- (ii) whether there are any potential barriers that might prevent eligible sections of the community from accessing the new collection services (also\*\*\*\*\*access to barriers or barriers associated with knowledge and understanding.

### **Ethnicity**

As no differential has been identified between ethnic groups in terms of their utilisation of the service, the new service will be made available to all ethnic groups on an equal basis. In order to avoid problems in communications identified by language barriers, pictorial images have been included in publicity material to ensure that all residents, including those whose first languages are not English or Welsh, can access the service. Where written or face-to-face language barriers are identified, the Council will seek to utilise available translation services.

### **Age**

The new services will be made available to all age groups but there is a potential indirect impact on the young, the elderly and those who look after them.

In devising the new service due regard was given to those residents with significant nappies in the household waste stream and it was decided to provide additional sealed storage containers to these residents. All householders experiencing concerns were visited by Waste Awareness Officers to provide help and guidance on managing their waste. It is considered that the positive impact on this group was proportionate to need.

Existing collection arrangements enable elderly residents who are unable to present their waste at the appropriate collection point with a dispensatory service. In particular, in these circumstances waste operatives will collect the waste receptacles from an agreed point within the property boundary. These arrangements will remain in place and be extended to cover each of the new waste and recycling / composting collection services.

## **Disability**

The new collection service will be provided to disabled residents but there is potential for indirect discrimination if the severity of their disability prevents them from actively using the new service.

As with the aged the Council already provides dispensation to those who, due to their disability, are unable to present their waste for collection. These arrangements will remain in place and be extended to cover each of the new waste and recycling / composting collection service.

Publicity materials are also produced in easy read format, and are available in large print (upon request) for those with visual impairments. Reasonable adjustments will also be made for those requiring other formats.

## **Gender**

The new collection and recycling / composting service will be provided to both genders but there exists some potential for indirect discrimination around the types of waste typically generated by each.

In devising the new service as with nappies, consideration was given to providing a sealed storage container to households generating

significant used female sanitary products. The decision has been taken not to provide a weekly service for these wastes on the grounds that its provision would be disproportional to need.

### **Sexual Orientation**

The new collection services should have no direct or indirect impact on residents regardless of sexual orientation.

### **Welsh Language**

All information and publicity materials will be produced bilingually in accordance with the Council's Welsh Language Scheme. The Welsh language will be given equal status in all publicity materials, and Welsh speakers' queries on the service will be answered in the Welsh language, when requested.

### **Religion and Belief**

The new collection services should have no direct or indirect impact on residents regardless of religion or belief.

### **General Consideration**

The new collection arrangement will be provided to all householders. However, it is recognised that it is not possible to always provide a comparable service to flats and multiple occupancy premises. Therefore it should be borne in mind that:

- (i) Flats and multiple occupancy premises may have wheelie bin receptacles for Kitchen Waste, dry recycling and residual waste.
- (ii) Where storage is a problem site specific arrangements will be implemented to satisfy the wide cross section of equalities groups, but it is not considered that any one group will be indirectly discriminated against as compared with another.

### **Incontinence**

In devising the new collection service consideration of the additional large caddie storage receptacle (predominantly the elderly, sick or infirm) generating incontinent waste was considered appropriate to ensure that no group was indirectly discriminated against.

## **Clinical Waste**

Clinical waste collections for no incontinence waste are outside the provisions of this new service and not considered within this specific EIA.

## **Financial Barriers**

As the new collection service does not require residents to purchase any equipment and promotes waste reduction at the expense of residual waste, it should provide residents with cost savings.

## **12. Recommendations**

Taking account of the findings described in Section II above, the following recommendations have been identified:-

- (i) To roll out comparable kitchen waste, recycling and residual collection services at the earliest possible time to the remaining households throughout the Vale of Glamorgan.
- (ii) In terms of communications:-
  - (a) To ensure that all publicity and promotional information concerning the new service is accessible to all residents and ethnic groups;
  - (b) To monitor contamination levels and ensure there is no ethnicity literacy bias connected with understanding the Council's promotional literature.
- (iii) To monitor levels of complaint / dissatisfaction in areas where enhancements to services have not been implemented (residual collections) on the basis of disproportionate need.

The Action Plan at Appendix 1 identifies lead officers and targets timescale for ensuring the implementation of the recommendations detailed above.

## **APPENDIX 1 - ACTION PLAN FOR IMPLEMENTATIONS OF EQUALITY IMPACT ASSESSMENT RECOMMENDATIONS**

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<b>Recommendation</b>	<b>Lead Officers</b>	<b>Timescale</b>	<b>Comment</b>
To roll out kitchen food collection service Vale wide	Miles Punter Clifford Parish Colin Smith	March 2011	Subject to Cabinet Approval
Communications (i) Publicity  (ii) Monitoring	Clifford Parish Vicky Lannon Colin Smith	On going	
Monitor complaints / dissatisfaction	OneVale Clifford Parish	On going	