

Budget Savings Proposals

Full Equality Impact Assessment (EQIA)

Section 1: General Information

1a) Name of the savings proposal

Commercial Waste Income Opportunities

1b) Service area

Public Realm

1c) Service manager

Jamie Blake

1d) Name and role of the officer/s completing the EQIA

Simon Baxter Head of Clean and Green

Section 2: Information about changes to services

2a) In brief please explain the savings proposals and the reasons for this change

The legislation relating to the collection of commercial waste is contained within section 45 of the Environmental protection Act 1990. The Act places a duty on a Local Authority to provide a commercial waste collection and disposal service to businesses if they are requested to collect commercial waste. The service must be chargeable and should be operated on a “break even” basis. Commercial waste services are highly price sensitive and there is considerable private sector activity, especially amongst UK retail chains, major office accommodation and large producers.

One of the key elements of the new charging structure is the introduction of pre paid refuse sacks. This will mean that small businesses will only pay for the waste that they produce and will not have to incur the cost of having a large commercial waste bin outside their premises.

Local Authorities mainly tend to collect from the Small Minority Ethnic (SME) sector and Tower Hamlets has, over recent years, increased the overall income to £2.78 million for 2010/11. The current service is based on estimated volumes of materials through collection contracts and container collection services. The sales aspect of the service is operated by Veolia, with material being collected as part of the waste collection contract. The service has been supported in part by enforcement action via the Local Enforcement Team, but has been affected by the necessity to deliver a “clear all” policy and a lack of coordination between the sales and enforcement activities.

Targets are based on a draft business plan that has been prepared by Council Officers and Veolia. The overall profile is to increase gross income by 50% which, allowing for a 33% increase in costs (mainly associated with the introduction of fee paid sacks and increased sales and enforcement activity) will generate an additional £1 million net income for 2013/14.

The estimates assume that prices will continue to increase above inflation due to the increase in landfill tax which effects disposal costs and that the borough will introduce a fee paid sack system across all business properties unless they have suitable off street storage areas for containers. Main shopping areas will have time banded collections.

Officers have allocated dedicated enforcement resources to work with the expanded Veolia sales team and a communications

strategy is under development, both in terms of sales literature and general information / awareness for the commercial sector.

2b) What are the equality implications of your proposal?

The current pricing structure requires businesses to have either a wheeled bin or a large metal Euro bin that are mainly placed on the pavement, sometimes near to the business or on some occasions away from the business and close to the road. A good example of this would be the large commercial waste bins in Brick Lane at the junction of Hanbury Street.

The permanent presence of these large obstructions is unsightly to visitors and residents, more importantly they do obstruct the highway and potentially cause a problem for the visually impaired. The proposed new pricing structure introduces a pre paid refuse sack scheme that will mean that businesses only pay for the waste that they produce and they will not have to incur the costs of having to pay for either wheeled bins or Euro bins. The only businesses that will be allowed to have bins must have suitable off street storage areas for containers. Main shopping areas will have time banded collections which will reduce obstructions to the visually impaired.

In relation to the test of relevance questions, we know that this will:

Reduce the level of obstructions on the highway to the visually impaired

It will not alter or change access to the service

It will involve revenue raising

By introducing the new pricing structure SME will benefit for only paying for waste they produce. There will be a major reduction in street clutter by the removal of containers off of the roads, which will have a direct impact on the visually impaired and improve the perceptions of the public realm.

Section 3: Equality Impact Assessment

With reference to the analysis above, for each of the equality strands in the table below please record and evidence your conclusions around equality impact in relation to the savings proposal.

<p>Race</p> <p><i>Identify the effect of the policy on different racial groups.</i></p>	<p>Will the change in your policy/service have an adverse impact on specific ethnic groups? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>None as the pricing structure applies to everyone equally</p>
<p>Disability</p> <p><i>Identify the effect of the policy on different disability groups</i></p>	<p>Will the change in your policy/service have an adverse impact on disabled people? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>None as the pricing structure applies to everyone equally</p>

<p>Gender</p> <p><i>Identify the effect of the policy on different gender groups (inc Trans) groups</i></p>	<p>Will the change in your policy/service have an adverse impact on men or women? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Non as the pricing structure applies to everyone equally</p>
<p>Sexual Orientation</p> <p><i>Identify the effect of the policy on members of the LGB community</i></p>	<p>Will the change in your policy/service have an adverse impact on lesbian, gay or bisexual people? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Non as the pricing structure applies to everyone equally</p>

<p>Religion and Belief</p> <p><i>Identify the effect of the policy on different religious and faith groups</i></p>	<p>Will the change in your policy/service have an adverse impact on people who practice a religion or belief? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Non as the pricing structure applies to everyone equally</p>
<p>Age</p> <p><i>Identify the effect of the policy on different age groups using the prompts above</i></p>	<p>Will the change in your policy/service have an adverse impact on specific age groups? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Non as the pricing structure applies to everyone equally</p>

<p>Socio-economic</p> <p><i>Identify the effect of the policy in relation to socio-economic inequalities</i></p>	<p>Will the change in your policy/service have an adverse impact on people with low incomes? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Non as the pricing structure applies to everyone equally, however it may have a positive effect in reducing the amount of street clutter and this will improve businesses, residents, visitors etc. perceptions of the public realm</p>
<p>Other</p> <p><i>Identify if there are groups, other than those already considered, that may be adversely affected by the policy?</i></p>	<p>Will the change in your policy/service have an adverse impact on any other people (e.g. carers)? yes/no Please describe the analysis and interpretation of evidence to support your conclusion.</p> <p>Non as the pricing structure applies to everyone equally</p>

Staff

Identify if there are any staff groups, , that may be adversely affected by the policy?

Will the change in your policy/service have an adverse impact on staff? yes/no
Please describe the analysis and interpretation of evidence to support your conclusion.

Non as the proposal relates to businesses in the borough and not staff

Section 4: Equality Impact Assessment Action Plan

Please list in the table below any adverse impact identified and, where appropriate, steps that could be taken to mitigate this impact.

If you consider it likely that your proposal will have an adverse impact on a particular group (s) and you cannot identify steps which would mitigate or reduce this impact, you will need to demonstrate that you have considered at least one alternative way of delivering the change which has less of an adverse impact.

Adverse impact	Please describe the actions that will be taken to mitigate this impact

If an adverse impact cannot be mitigated please describe an alternative option, its costs and the equality impact.

Section 5: Future Review and Monitoring

Please explain how and when the actual equality impact of these changes will be reviewed and monitored.

There will be a six month review of the introduction of the pre paid refuse sack scheme and the rollout of the time banded collection service. This will provide the Council with the opportunity to review collection times and analyse complaints that will then be used to improve the service and reduce any equality issues that may have arisen.

APPENDIX A: Equality Impact Assessment Test of Relevance

TRIGGER QUESTIONS	YES / NO	IF YES PLEASE BRIEFLY EXPLAIN.....
Does the change reduce resources available to address inequality?	No	<ul style="list-style-type: none"> • What outcome did the previous intervention seek to achieve? • What evidence do you have about how effective the previous intervention was?
CHANGES TO A SERVICE		
Does the change alter access to the service?	No	<ul style="list-style-type: none"> • Is there evidence that access will be more difficult or costly for some people?
Does the change involve revenue raising?	Yes	<ul style="list-style-type: none"> • What evidence do we have about who will pay? Everyone will pay for the waste that they produce • What impact will this have on the income available for these people? In some cases it could increase the income as those businesses that currently have bins will not have to pay as much for the replacement pre paid sack scheme
Does the change alter who is eligible for the service?	No	<ul style="list-style-type: none"> • What evidence do we have about who will no longer be eligible for the service? • Is this likely to lead to poorer outcomes for those who cannot access the service?

<p>Does the change involve a reduction or removal of income transfers to service users?</p>	<p>No</p>	<ul style="list-style-type: none"> • What evidence do we have on who has benefits from these transfers? • What is the likely impact of the removal of the income to current beneficiaries?
<p>Does the change involve a contracting out of a service currently provided in house?</p>	<p>No</p>	<ul style="list-style-type: none"> • Is there a need to include promotion of equality in the new contract arrangements?
<p>CHANGES TO STAFFING</p>		
<p>Does the change involve a reduction in staff?</p>	<p>No</p>	<ul style="list-style-type: none"> • What evidence do we have about the composition of the current workforce? • Are there some groups who are likely to be disproportionately affected by the proposed reduction?
<p>Does the change involve a redesign of the roles of staff?</p>	<p>No</p>	<ul style="list-style-type: none"> • What evidence is there that this could have an impact on equal pay? • Does the change reduce the ability of staff to work flexibly?