

## **Equalities Analysis Assessment Proposed Waste & Recycling Service Changes**

### **1. Introduction**

Equality Analysis Assessments (EAA) are a tool that the Council's uses for assessing the possible impact (positive and negative) of policies, service delivery plans, strategies, projects, programmes, commissioning activities or other initiatives. EAA's are a mechanism through which the Council demonstrates compliance with the Equality Act 2010. The Equality Act 2010 replaced all the previous anti-discrimination laws and brought them together into a single Act, including a new public sector Equality Duty which came into force in April 2011.

In addition to its statutory obligations under the Equality Act 2010, the Council has set its own equality objectives that underpin the Comprehensive Equalities Scheme (2012-2016). These five equality objectives are as follows:

1. Tackle victimisation, harassment and discrimination;
2. To improve access to services;
3. To close the gap in outcomes for citizens;
4. To increase understanding and mutual respect between communities; and
5. To increase participation and engagement.

In addition to the above, particular groups are covered against discrimination as they have "Protected characteristics".

This Equality Analysis Assessment considers the impact of the potential changes to the waste and recycling services on the 'Protected Characteristics'. It is influenced by the requirements of the Public Sector Equality Duty and the Council's own equality objectives, and is proportionate in approach. It should be noted that there is no legal requirement on the Council to produce a formal Equality Analysis Assessment as part of this policy review, but to do so is currently considered to be best practice by the Council.

### **2. Potential Changes to the Service**

An Equality Analysis is being undertaken as the Council is looking at significantly changing its waste & recycling services. The drivers for this potential change are detailed below.

Improved environmental performance – Lewisham's recycling rate is the lowest in the country and by changing the services that are offered could have a significant impact on reducing waste in the first instance, increasing the amount that is recycled or composted and reducing the carbon footprint of waste and recycling collected and disposed of.

Financial – the waste & recycling services have had an efficiency review undertaken against the backdrop of identifying savings moving forward given the current climate of austerity. Further, the Council could face fines from Central Government if contribution to the 50% target is not improved upon.

Legislative – the key legislative drivers are ensuring compliance with the Waste Regulations, which include applying the Waste Hierarchy (Regulation 12) and separately collecting paper, glass, metals and plastics (Regulation 13). There is a further requirement that the authority contributes to the London and national recycling targets.

Future waste planning – SELCHP's Energy from Waste (EfW) contract ends in early 2024. Incineration prices tend to be higher than other forms of disposal making it necessary to explore all options for managing waste and recycling effectively and efficiently.

At present the Council collects refuse and recycling weekly and offers a garden waste collection service at a charge. The recycling is co-mingled and collected together in one bin.

It is becoming more expensive to dispose of waste and it costs the Council less to dispose of material through recycling and composting compared with incineration. The Council could also get an income from selling some good quality materials that are recycled, paper for example.

To comply with the regulations, there are a number of actions the Council could consider that might also help increase the amount of material that is collected for recycling. This includes options for collecting different materials for recycling separately rather than altogether as the Council does now, introduction of food waste collections and a subscription based garden waste service. Some changes could mean more bins and boxes for residents and some changes could also mean changing the frequency of collections.

A total of ten options were modelled, and the service areas that these options will affect are around the following themes:

- Implementing a subscription based garden waste service;
- Implementing a separate food waste service;
- Separately collecting paper from the rest of the recycling or keeping the recycling comingled;
- Changing the frequency of collections to fortnightly.

The possible impact that these potential service changes may have on any of the protected characteristics are detailed in the next section.

### 3. Impact of Proposed Changes

As a result of the Let's Talk Rubbish consultation and engagement activities, and analysis of the key issues and findings from the Waste & Recycling Efficiency Review and Waste Regulations Assessment, a set of recommendations have been proposed for consideration by Mayor and Cabinet in January 2016.

Table 1 below identifies how these proposed recommendations might impact on equalities, and in particular the characteristics 'protected' under the Equality Act 2010.

**Table 1: Equalities Analysis Scoping Table**

Protected Characteristic	Assessment of Potential Impact (+/-) – High, Medium, Low, Neutral	Reason for this assessment
Age	(+/-) Medium	<p>Potential reduced ability to use services and participation could be low as a result e.g. if there are mobility difficulties in moving additional containers to edge of property.</p> <p>Potential difficulties in accessing information e.g. people with visual impairments or lack of understanding of information around service changes.</p> <p>Potential to promote waste management issues through young people's forums e.g. schools, Young Advisors.</p>
Disability	(-) High	<p>Potential reduced ability to participate in services and participation could be low as a result e.g. if there are mobility difficulties in moving additional containers to edge of property.</p> <p>Impact on street scene could pose an issue for people with</p>

		<p>disabilities e.g. wheelchair users or people with visual impairments.</p> <p>Potential difficulties in accessing information e.g. people with visual impairments or lack of understanding of information around service changes.</p>
Gender re-assignment	Neutral	The ability to access and use the proposed new services should not adversely affect this protected characteristic.
Pregnancy and maternity	(-) Medium	<p>Potential that some services may not be adequate for households with young children e.g. potential impact of nappy waste.</p> <p>Impact on street scene could pose an issue for people with pushchairs.</p>
Ethnicity	(+/-) Medium	<p>Potential language barriers and cultural differences may mean that participation in new services is low. This could be positive as well as negative as certain cultures may have different purchasing or dietary habits.</p> <p>Potential difficulties in accessing information e.g. lack of understanding of information around service changes if English isn't the first language.</p>
Religion or belief	(-) Low	Potential religious or other beliefs may mean that participation in new services is low.
Sex	(-) Low	It may be that women are seen as the recyclers in households.
Sexual orientation	Neutral	The ability to access and use the proposed new services should not adversely affect this protected characteristic.

Scoping the assessment and determining where to focus attention has flowed from the analysis of potential impacts set out in the scoping table above. Proportionally, the assessment needs to concentrate on areas with highest potential impact. Key issues for consideration include:

- Tackling potential barriers to accessing and utilising services, in particular relating to the protected characteristics of 'Age', 'Ethnicity', 'Disability' and 'Pregnancy and Maternity';
- Tackling potential barriers to access to information and awareness raising in particular relating to the protected characteristics of 'Age', 'Ethnicity' and 'Disability' and the ability to reach out to 'hard to engage groups including transient populations;
- Tackling the potential issues that an increased number of containers, and in particular where these may be stored, in particular relating to the protected characteristics of 'Age', 'Disability' and 'Pregnancy and Maternity'.

#### 4. Assessment of Data and Research

There a number of factors that can affect the type of service that is introduced and the performance of that service. Before the specific equalities monitoring is undertaken additional data and research and its impact on proposed changes to the waste and recycling services is detailed below.

##### Population & Diversity

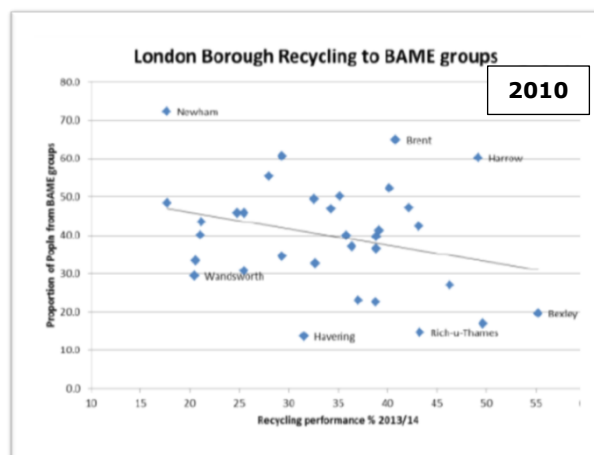
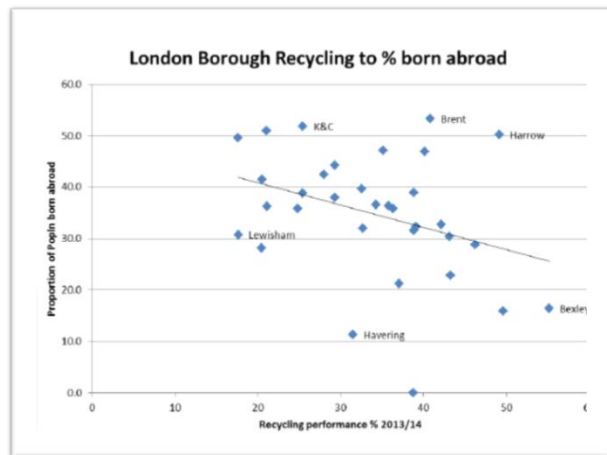
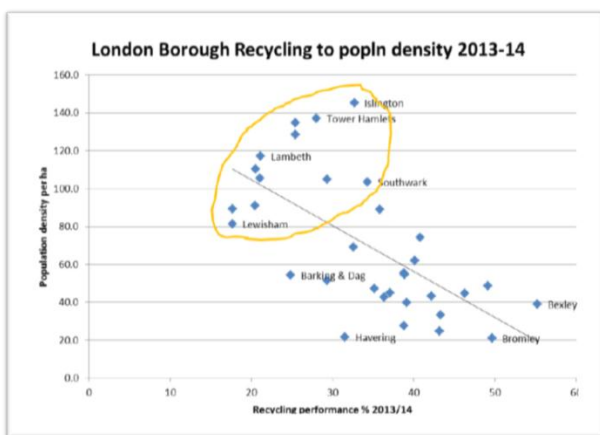
Based up the 2015 Mid-Year Population Estimates from the Office for National Statistics, Lewisham has a population of some 292,000 (the 13th largest in London and the 5th largest in Inner London). The population of the borough has increased by some 16,000 since the 2011 Census and over the next 20 years is forecast to be amongst the fastest growing in London.

In the 2011 census, 46.5% of the residents in Lewisham were from Black, Asian and Minority Ethnic groups (BAME), which compares to 28.8% in London and 9% in England. There has been a growth of the Black African population, which across the borough has increased from 22,571 in 2001 to 32,025 in 2011.

Lewisham is the 15th most ethnically diverse local authority in England and 130 different languages are spoken.

Sita UK have undertaken some analysis of population and diversity against recycling performance and have concluded that these factors may have an effect on the recycling performance in boroughs. In the case of the graphs below, Sita UK have concluded that recycling performance can be attributed to a number of factors listed below (please note that Lewisham has not tested these assumptions locally):

- The higher the population density, the lower the recycling performance;
- The proportion of the population that has been born abroad, the lower the recycling performance, and;
- The proportion of the population from BAME background, the lower the recycling performance.



Source: Sita 2015

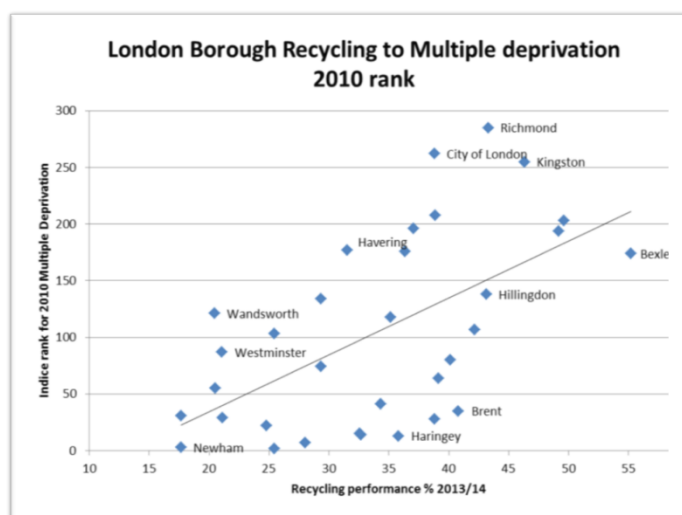
### Levels of Deprivation

In relative terms, Lewisham remains amongst the most deprived local authority areas in England. In the overall Index of Multiple Deprivation or IMD (the combined score from all the indices), Lewisham's average score was 28.59, which puts Lewisham as the 48th most deprived of all 326 Local Authorities (one being the most deprived), compared to a ranking of 31st for 2010 and 39th for 2007. This means that Lewisham is within the 20% most deprived Local Authorities in England.

Lewisham is ranked tenth of the thirty three London boroughs (including the Corporation of London), unchanged from the London ranking of tenth in 2010. The IMD ranking of most London boroughs has improved, though notable ranking increases have occurred in Barking and Dagenham (up from 22nd to 12th), Westminster (up from 87th to 57th), and Croydon (up from 107th to 96th).

Deprivation is concentrated in New Cross and Downham, where in both wards, nine out of the ten Layer Super Output Area's LSOA are in the 20% most deprived in England. In Bellingham seven out of nine LSOAs are in the 20% most deprived. In Downham the situation is unchanged from 2010, but in New Cross relative deprivation has increased significantly as only half of LSOAs were in the 20% most deprived band in 2010.

Sita UK have also analysed levels of deprivation against recycling performance, shown in the below graph, which could demonstrate that areas with high levels of deprivation are often the poor performing authorities in terms of recycling rates. (Please note that these graphs were used using 2010 data and note that Lewisham has not tested these assumptions locally).



Source: Sita (2015)

### Age

The age profile of Lewisham's residents is similar to London and England, as can be seen in the Table 3 below. The population is a relatively young one (only 11% of residents are over 65) in comparison with the national average (15% over 65). Black, Asian and minority ethnic (BAME) groups make up a significant proportion (48%) of the 0-19 age group. There are 34,817 young people between the ages of 5 and 16 (the age of schooling), and 17,772 children under 5 years of age living in the borough of Lewisham.

**Table 2: Age profile of Lewisham's residents compared to London and England** (Source: Census 2011)

	Lewisham %	London %	England %
Aged 0-4; years	7.10	6.7	6.00
Aged 5-15; years	14.0	13.5	14.20
Aged 16-19; years	4.60	4.7	4.90
Aged 20-44; years	45.30	42.7	35.30
Aged 45-64; years	18.01	20.0	23.75
Aged 65; years and over	10.50	11.9	15.30

## Housing

There are approximately 121,235 households in Lewisham (Council Tax) made up of approximately 80,000 kerbside properties and 41,000 estate properties.

Table 3 provides the breakdown of the housing stock in Lewisham. As can be seen from the table, compared to the London average Lewisham has a relatively low proportion of residents living in both detached and semi-detached properties, whilst terraced properties and converted flats & maisonettes are slightly higher than the London average. As is to be expected for an inner London borough, the proportion of residents living in flats, either purpose-built, converted or within a commercial building (51.9%) is significantly higher than the average for England (19.3%).

**Table 3: Housing stock in Lewisham compared to London and England**

	Lewisham %	London %	England %
House or Bungalow: Detached	2.9	6.0	22.5
House or Bungalow: Semi-detached	12.9	19.1	31.6
House or Bungalow: Terraced (including end-terrace)	31.5	25.9	25.8
Flat, Maisonette or Apartment: In a Purpose-Built Block of Flats	32.5	33.0	14.0
Flat, Maisonette or Apartment: Part of a Converted or Shared House	17.9	13.0	4.2
Flat, Maisonette or Apartment: In a Commercial Building	1.5	1.8	1.1
Caravan or Other Mobile or Temporary Structure	0.1	0.1	0.4

This provides its own challenges in term of service provision both from an ease of use for the householder and operational deliverability for the service. Recycling services provided to flats, whether in a shared or converted house or properties that are purpose built where communal bins operate, tend to have lower participation rates and higher contamination rates than houses.

With regard to the tenure, Table 4 below shows a more detailed breakdown from the 2011 Census. The proportion of social / affordable rented housing in 2011 was slightly lower (27.7%) than that derived from local authority Council Tax data for the same year (28.0%), and conversely the level of private sector housing was slightly greater. Just over a quarter of private sector housing (19.7% of all dwellings) was rented from private landlords. This is a lower figure than the London average (26.4%), largely because the latter is skewed upwards by very high levels of private renting in Kensington and Chelsea, Westminster and Camden. The proportion of owner-occupied housing in South East London (52.7%) was higher than the London-wide average (49.5%) but much lower than the average for England (64.1%).

**Table 4: Housing Tenure Lewisham Compared to London and England** (Source: Census 2011)

Percentage of all households								
	All owner occupied	Owned outright	Owned with mortgage	Shared owner	Affordable rented	Private rented	Private landlord	Other rented / rent free
Bexley	73.3	32.5	40.0	0.8	14.4	12.2	10.5	1.7
Bromley	71.7	33.4	37.5	0.8	14.1	14.2	12.4	1.8
Greenwich	44.9	16.4	26.9	1.6	34.3	20.9	18.5	2.4
Lewisham	43.6	14.9	27.5	1.2	31.1	25.3	23.0	2.3
Southwark	31.3	9.8	19.5	2.0	43.7	24.9	22.2	2.6

SE London	52.7	21.3	30.1	1.3	27.7	19.7	17.5	2.3
London	49.5	21.1	27.1	1.3	24.1	26.4	23.7	2.6
England	64.2	30.6	32.8	0.8	17.7	18.2	15.4	2.7

Tenure also can provide issues with regard to participation. Households in the private rented sector or private landlords can have a transient population. This makes the provision of information on services difficult to communicate and therefore participation and / or the correct participation of services more difficult.

## 5. Equalities Monitoring

Equalities monitoring has been undertaken as part of the Let's Talk Rubbish consultation process that, alongside the Waste & Recycling Efficiencies Review and Waste Regulations Assessment, has informed the proposed service change.

The key instrument for consultation was the self-completion survey, which captured the protected characteristics of those 5,884 respondents that chose to provide this information about themselves. Promotion of the survey ensured that groups and individuals were targeted that represent the interests of particular protected characteristics (e.g. age and disability).

In addition to Let's Talk Rubbish online survey, a Citizens Forum was held that was a 'best fit' representative sample of 50 Lewisham Residents, five focus groups targeted particular housing types and ten workshops with the refuse and recycling operatives were delivered, the relevant results of which have been incorporated into this analysis.

The following section examine each of the characteristics protected under the Equality Act 2010, and identifies key data and analysis that should be considered as part of the decision-making process during the development of any new services. Each of the protected characteristics are discussed in turn below.

### 1. Age

Age is defined by reference to a person's age group. An age group can mean people of the same age or people of a range of ages.

#### Data Summary for Age

According to the 2011 Census:

- 70,100 Lewisham residents are aged between 0-19 (25% of the population);
- 179,800 Lewisham residents are aged between 20-64 (65% of the population);
- 26,200 Lewisham residents are older people aged 65 and over (9.5% of the population).

Analysis of responses to the survey questions by the protected characteristic of age, revealed the following findings:

- The largest number of responses was received from the 35-39 age group. As a group they are proportionately more likely to say that recycling is important or very important and also more likely to be satisfied to some extent with the current waste and recycling collection service. They also strongly agree or agree (75%) with the introduction of a weekly food waste service, however, those aged 60 and over agreed to a lesser extent that a food waste service should be introduced.

- Those aged 35-39 also disagree to some extent that properties without sufficient front garden space should be exempt for the new arrangements and either strongly agree or agree that properties without sufficient garden space should still be offered a weekly waste and recycling collection service.
- Receiving further information by letter or leaflet delivered to their door is still the most popular means of communication across all age bands, but it is worth noting that the use of smartphone apps, twitter and Facebook as means of communication diminishes significantly for those aged over 50.
- The majority of people who responded to the consultation live in a house with a wheelie bin. However, those living in a converted flat or flat block are significantly higher than the average for the consultation for those aged between 25 and 34.
- Respondents aged 45 and over are also more likely to have a garden. They broadly support the introduction of a garden waste service, but not the introduction of a charge for this service.

Analysis of the available qualitative feedback on the themes has highlighted a number of key issues that have been specifically attributed to age as a protected characteristic. These have been summarised below:

- Numerous respondents expressed concerns regarding the separation of recycling materials due to physical inability. This was especially in regards to lifting and carrying an extra box for paper and cardboard, as well as bending down to present it for collection.
- Many felt that being frail, at risk of over exertion, illness, having age related diseases such as arthritis, or simply not being strong enough, would prevent them from carrying an extra box, and stated that the current wheeled bins were already physically difficult for them. In addition, the desire for simplicity was expressed, some stating that sorting waste could get confusing for those with dementia or for those who are mentally impaired in some way.
- Smaller bins (whether paper boxes or food waste bins) may also be blown down the street from high winds and the elderly may not physically be able to retrieve them.
- In addition, fortnightly collections were a concern for the same physical impairment reasons. Currently, a half full bin was often difficult enough for some elderly to move. If the bins were collected fortnightly, bins would become too full and heavy to manoeuvre and the elderly may require 2 bins for each type of waste in order for them to move the bins. Some stated that due to their limited space, this solution would be impractical, would increase their risk to exposure during inclement weather, and exert more physical energy, as it would require twice the amount of time to move extra bins.
- Accumulating nappies from visiting grandchildren also worried some elderly residents if the collection service was fortnightly, due to the weight of the bin and the inability to clean the bin adequately from smell from lack of physical strength. This was also mentioned in regards to sanitary waste.
- Remembering fortnightly collection dates were also of concern.
- Street bin clutter and the inability to manoeuvre with ease around bins on streets, or extra bins within properties that may clutter pathways or driveways were of considerable concern. Elderly pedestrians, those using mobility scooters or wheelchairs, or grandparents with prams voiced that it would increase the difficulty in using the public highway. It was felt by numerous residents that



on bin day the paths were already inaccessible and that additional bins would worsen this problem, especially on narrow pathways or where parking was permitted on pathways.

*'This [bin clutter] creates an obstacle course, particularly on streets with narrow pavements or pavement parking, which is inconvenient and impassable especially for people with buggies, shopping, luggage, or those with disabilities. It also sends a signal that the property is empty, especially if left all day or overnight.'*

- There was a more positive response to introducing a regular garden waste collection service; using the current sack system was difficult for some elderly, and a wheeled bin service would be welcome.
- There was however strong negative opinion regarding the cost of the subscription fee, with some stating that they either have a very low income or that they may be asset rich, but money poor, and simply could not afford the £80 that was being suggested.
- Some feared that without the sacks, the financial inability to access a subscription, and either no car to access the Reuse & Recycling Centre (RRC), or not being able to climb the stairs in the RRC facility, fly tipping would become more prevalent.
- Some stated they missed the satellite garden waste collection service, and suggested to reinstate the service with an annual pass (paid for) rather than a subscription to an extra bin, which would reduce street clutter.

*'Changes to garden waste collection are important to me. The green bag system is difficult for me, I am 80 years old and a bin would be wonderful. However £80 is a lot of money...'*

- Finally, numerous residents commented that some residents should be exempt from certain changes, or be able to utilise assisted collections. Access to more recycling facilities and having another RRC in the south of the borough would be helpful.

## **2. Disability**

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. A summary of data on disability is set out below.

### **Data Summary for Disability**

According to the 2011 Census:

- 7.1% (19,523) Lewisham residents indicated that their day-to-day activities were limited a lot, and 7.3% (20,212) indicated that their day-to-day activities were limited a little;
- 5.3% (14,318) Lewisham residents indicated that they are in bad health or very bad health;
- 8.1% (22,521) Lewisham residents provide some form of unpaid care;
- Over 5,000 Lewisham residents provide 50+ hours of unpaid care per week;
- 160 Lewisham residents indicated that sign language was their main language.

Analysis of responses to the survey questions by the protected characteristic of disability, revealed the following findings:

- Less than 10% of respondents indicated that they had a disability, of these over half indicated that their disability related to a long-standing condition. Respondents with mental health (50%) and learning difficulties (44%) indicated that the most important reason for service change for them would be 'Making it easier for residents to recycle'.
- Respondents with disabilities are slightly less likely (40%) to be satisfied with the current waste collection service when compared to the percentage for all respondents (44%). Those with sensory, mental health, learning difficulties and long standing conditions agreed more strongly that the council should collect paper separately from other materials to be sold on. They also either strongly agreed or agreed that a food waste service should be introduced.
- They broadly support the introduction of a garden waste service, but not the introduction of a charge for this service. However, those with physical disabilities were more likely to strongly disagree or disagree (50%) with the introduction of a fortnightly collection when compared to the percentage for all respondents (40%). Those with physical and sensory disabilities were more likely (55%) to agree that properties without sufficient front garden space should be exempt from any new arrangements and still be offered a weekly collection service for food waste (79%).
- A letter or leaflet delivered to their door is by far the most popular means to receive additional information for this group. For those with sensory conditions or learning difficulties easy-read or alternative formats will need to be investigated.

Analysis of the available qualitative feedback on the themes has highlighted a number of key issues that have been specifically attributed to disability as a protected characteristic. These have been summarised below:

- Considerable concern was raised regarding street clutter caused by additional bins, such as food waste or paper recycling bins. Disabled pedestrians, and people using mobility scooters or wheelchairs, stated that manoeuvring around bins on streets, or within properties where bins clutter pathways or driveways, was already problematic and additional bins would increase the degree of difficulty.
- It was expressed that the paths were currently like an '*obstacle course*' and were unsafe or inaccessible on collection day, particularly on narrow pathways or where parking was permitted on pathways. More bins would worsen the situation.

*'As a blind person I struggle already with so many bins on the pavement ...introducing even more bins ...is a real problem to so many of us, the disabled, wheelchair users and blind, mums with prams and children to name some... I can support no change in existing policies that will make the matter worse, despite my concerns for the environment.'*

*'My mother is severely disabled and has to go out in a wheelchair; additional bins would be a hazard...'*

- In regards to separating recycling, additional boxes or multiple bins, many stated that having the extra responsibility of sorting or presenting more bins for collection would be too physically demanding. Disabled or severely ill people find the current amount and style of bins challenging enough and stated they could not lift a box, or would find that placing multiple bins out too difficult. Multiple bins could also be confusing for those with visual impairment, and the mentally disabled may find the change from a co-mingled system to separated recycling confusing.

- A number of residents found it challenging, inaccessible or unsafe to take their garden waste to the RRC or to use the current sack system, and expressed a desire for a regular garden waste collection service.
- There was however strong negative opinion regarding the cost of the subscription fee, with some stating that they have a low income and could not afford the £80 that was being suggested.

*'I suffer from generalised osteo-arthritis and a damaged shoulder... and I am physically unable to wrestle garden waste into plastics bags. I would be willing to pay for this service [but]£80 would be excessive.'*

- Fortnightly collections were not well received, with residents stating that pet, nappy or sanitary waste needed to be collected weekly, as some felt that they physically weren't able to bury pet waste or clean out their bins from smell. The added weight to the bins would also be prohibitive when presenting them for collection and they would require assistance.
- Some also commented that Assisted Collections needed to be promoted and that education and information needs to reach deaf or blind people, housebound and other disabled people. Strongly voiced was the need for flexibility in how waste and recycling is collected for disabled or ill people.

### **3. Gender**

Gender has the meaning usually given to it and refers to whether a person is male or female. A summary of data on gender is set out in the box below.

#### **Data Summary for Gender**

According to the 2011 Census:

- There are 135,000 males living in Lewisham and 140,900 females;

According to the 2015 mid-year population estimates:

- Total Population is 292,000;
- Females are more numerous than males with numbers at 148,412 and 143,521 respectively.

Analysis of responses to the survey questions by the protected characteristic of gender, revealed the following findings:

- More than half of all respondents were female and more than 84% feel that recycling is very important or important compared to 81% of males. Females are also more likely (85%) to strongly agree or agree that they would be prepared to separate their paper compared to 77% of males.
- Both males and females feel strongly that a garden waste service should be introduced, but males are more likely to favour a charge of £100 or £120 for the service compared to females who supported £80.
- The question of introducing a fortnightly refuse service with weekly food collection split males at almost 50%; however, females are more likely to agree to some extent that the fortnightly service should be introduced.

- Females strongly agreed or agreed (84%) that properties without sufficient front garden space should still be offered a weekly food collection service if they want one. Slightly more males (11% compared to 9%) live in a flat inside a large block with a communal bin.
- Males are more likely to favour a smartphone app compared to women who are more likely to favour stickers on bins.

Analysis of the available qualitative feedback has revealed that there are no key issues that have been specifically attributed to gender as a protected characteristic.

#### **4. Gender reassignment**

People who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex have the protected characteristic of gender reassignment. A summary of data on gender reassignment is set out in the box below.

##### **Data Summary for Gender Reassignment**

- In 2006-07 Lewisham Council commissioned a research study of the LGBT populations who lived, worked, studied or socialised in the borough;
- Of the 316 respondents, seven identified as trans-people, which was insufficient to draw quantitative conclusions.

Analysis of responses to the survey questions by the protected characteristic of gender reassignment, revealed the following findings:

- Of the total number of respondents 218 indicated that their gender is different to their gender at birth. They were slightly less likely (76%), when compared to the percentage for all respondents (81%) agree to some extent that they would be prepared to separate out their paper into a separate box.
- Respondents in this category are less likely to live in a house with a wheelie bin and more likely to live in a type of flat, whether in a converted house or block when compared to all respondents. They are also interested in receiving their information in a variety of formats.

Analysis of the available qualitative feedback has revealed that there are no key issues that have been specifically attributed to gender reassignment as a protected characteristic.

#### **5. Pregnancy and maternity**

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding. A summary of data on pregnancy and maternity is set out in the box below.

##### **Data Summary for Pregnancy & Maternity**

- The NHS Lewisham Clinical Commissioning Group (2013-18) states that Lewisham's birth rate is rising and is expected to continue at a high level for several years before starting to fall;
- The general fertility rate (number of live births per 1000 women aged 15-44) in Lewisham is higher than the London and England averages;

- In 2011 the wards with the highest rates were Crofton Park and Rushey Green; Brockley and Telegraph hill had the lowest;
- For 2012 there were about 4,900 new babies recorded as Lewisham residents.

Analysis of responses to the survey questions by the protected characteristic of pregnancy & maternity, revealed the following findings:

- Of those that responded to the consultation 225 indicated that they were either pregnant or on maternity leave. This group were more likely (51%) to suggest that reducing our impact on the environment was the most important reason for service change when compared to all respondents (40%). They are also less satisfied with the current waste collection service.
- When compared to all respondents (39%) those who indicated that they are pregnant or on maternity leave were more likely to disagree or strongly disagree (48%) that separating out items would encourage them to recycle more.
- Over 80% agreed to some extent that they would be prepared to separate out paper. They were also in favour of introducing a food waste collection and garden waste collection service. Whilst more than 40% are in favour of charging the majority of these indicated that an £80 would be appropriate.
- For properties without significant front garden space 88% indicated that these properties should still be offered a weekly food collection service if they want it.
- A letter or leaflet delivered to their door was the most favoured option followed by stickers on bins for receiving further information regarding changes to waste and recycling services.

Analysis of the available qualitative feedback on the themes has highlighted a number of key issues that have been specifically attributed to pregnancy & maternity as a protected characteristic. These have been summarised below:

- Numerous respondents felt that fortnightly collections were unacceptable due to the accumulation of nappy waste; however some suggested that provided there was a separate weekly collection for nappy, sanitary and pet waste for those who requested it, fortnightly collections were possible for other waste streams.
- Many expressed their desire to have a flexible service, and access to bigger or additional bins if required, to avoid overflowing bins from the extra waste that is generated from growing families. The desire for extra bins was mainly for refuse and food waste bins and caddies.
- Though many people expressed the desire for more bins to accommodate nappy and food waste, there were also many negative comments regarding street clutter caused by bins on collection day. Parents presently felt that the paths were difficult enough to manoeuvre their buggies on while bins were out on the street for collection, some stating that walking out on to the road was their only option. The introduction of additional bins would increase this problem, especially on narrow pathways or where parking was permitted on pathways.

*'...people like myself with a pushchair, or those less able to get around, are faced with areas of very narrow pavement and a slalom effect when travelling along the pavements.'*

*'Mums with buggies struggle to get past; my mother in a wheelchair really has problems.'*

## **6. Ethnicity**

Race refers to the equality group of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. A summary of data on race is set out in the box below.

### **Data Summary for Ethnicity**

According to the 2011 Census:

- 53.68% (147,686) of all Lewisham residents are white (White British, White Irish, White Gypsy or Irish Traveller, and White Other);
- People from a Black Caribbean, Black African and other Black ethnic background represent 27.2% (74,942) of the population;
- People from an Indian, Pakistani, Bangladeshi, Chinese and other Asian background represent 9.3% (25,534) of Lewisham's population;
- English is the main language for 79.4% (219,035) of Lewisham residents, though 1,038 Lewisham residents cannot speak English;
- Nearly one in ten households in Lewisham do not contain a resident who has English as a main language;
- Other than English, the top 3 languages spoken in the borough are Polish, French and Tamil.

Analysis of responses to the survey questions by the protected characteristic of ethnicity, revealed the following findings:

- Of those respondents that provided their ethnicity 4,424 indicated that they were white, 186 indicated that they were of a mixed ethnicity, 404 Black and 232 Asian or other.
- White respondents (89%) were less likely than all respondents (93%) to indicate that recycling is either very important or important to them. Black respondents (34%) were less likely to consider reducing our impact on the environment as a reason for service change when compared to all respondents (39%). Respondents who indicated that their ethnicity was mixed thought that the most important reason for service change was making it easier for residents to recycle (49%) compared to 46% for all respondents.
- All ethnic groups (Mixed, Black, Asian and Other) apart from White strongly agree or agree that separating encourages recycling (at least 30% respectively) compared to all respondents (28%).
- White respondents are slightly less likely (69%) to agree to some extent that the Council should collect paper separately to enable it to sell it when compared to respondents overall (73%). However, Mixed (79%) and Black (80%) respondents are more likely to agree to some extent to this.
- When considering whether a respondent would be prepared to separate out their paper into an additional small box, White respondents were more likely (21%) than respondents overall (12%) to disagree or strongly disagree with this.

- Nearly two thirds (65%) of all respondents agreed to some extent with a weekly food collection. However, Asian and other ethnic groups strongly agreed and agreed (81%) with this proposal followed by Mixed respondents at 75%.
- Asian and Other (43%) and Black (46%) ethnic groups are slightly more likely to disagree to some extent that the Council should charge for a garden waste service when compared to all respondents (41%). Almost 50% of Black respondents indicated £80 as their preferred charge for a garden waste service if it were introduced.
- More than half (52%) of Asian and Other ethnic group respondents strongly agree or agree that the Council should introduce a fortnightly collection service with weekly food waste collections. Whilst just over a third (36%) of Mixed respondents agreed to some extent. Overall 45% of respondents agreed to some extent with the proposal that the frequency of collections should be changed.
- More than three quarters (80%) of all respondents were in favour of properties without sufficient garden space being offered a weekly food collection service if they want it. However, Black and Mixed respondents exceeded this with 85% of Black respondents and 84% of Mixed respondents either strongly agreeing or agreeing with this proposal.
- Receiving further information about changes to waste and recycling services by letter or leaflet to their door is still the most popular way across all ethnic groups.

Analysis of the available qualitative feedback on the themes has highlighted a number of key issues that have been specifically attributed to ethnicity as a protected characteristic. These have been summarised below:

- That there is no uniform system for waste disposal nationwide, was considered challenging and confusing for many respondents, but even more so for those whose first language is not English and who may come from a culture where waste disposal takes on a very different form.
- The key issue here centred on education and ensuring that information regarding waste and recycling services effectively reaches BAME groups, 'foreign and transitory people'.
- The need for an easy to understand system was called for, with some residents stating that too many bins (for separated recycling) would be confusing. Alongside a simple system was the desire for clear, easy to understand education. Education and information would need to saturate all forms of communications, including taking into account language barriers.
- Some community groups commented that the culture of waste and recycling disposal is not on some people's 'radar', let alone their understanding of current services, and how it may change in the future. The same community groups also expressed a lack of resources to translate leaflets or other education related to service changes.

## **7. Religion or belief**

Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition. A summary of data on religion and belief is set out in the box below.

### **Data Summary for Religion or Belief**

According to the 2011 Census:

- 63.8% (176,225) of Lewisham residents described themselves as having a faith or religion, 27.2% (75,155) described themselves as having no faith or religion, whilst 8.9% (24,505) did not state a religion;
- Amongst those residents that described themselves as having a faith or religion, 52.8% (145,588) identified their faith as Christian, whilst 6.4% (17,759) described themselves as Muslim;
- Of other religions, Hindus represent 2.4% (6,562) of the population, whilst Buddhists represent 1.3% (3,664) of the population.

Analysis of responses to the survey questions by the protected characteristic of religion or belief, revealed the following findings:

- Nearly half of all respondents indicated that they had no religion. Just over one fifth indicated that they were Christian. Only 6 respondents indicated that they were Sikh and their views have not been taken into consideration as the numbers are too small to be representative. All other categories were included in the analysis.
- Nearly 50% of those that indicated they were Hindu (31) felt that reducing our impact on the environment was the most important reason for service change.
- Jewish (32) and Hindu (31) respondents are the least likely to feel satisfied to some extent with the current waste service.
- Respondents that indicated they were Christian (32%), Buddhist (30%), Hindu (61%) and Muslim (45%) were more likely to strongly agree or agree that separating items encourages recycling when compared to all respondents (28%).
- More than 70% of Buddhists, Hindus and Muslims either strongly agree or agree with income generation from separating out paper to allow the Council to sell it.
- The majority of respondents across all religions and beliefs strongly agree or agree that they would be prepared to separate their paper.
- Those with no religion (69%), Buddhists (69%), Hindus (83%) and Jewish (74%) respondents are more likely to strongly agree or agree that the council should introduce a food waste service than when compared to all respondents (66%).
- Jewish respondents are proportionally more in favour of the introduction of a garden waste service. The majority of respondents across all religions and beliefs are in favour of charging £80 for a garden waste service.
- Those with no religion (51%), Buddhists (51%) and Hindus (60%) are more likely to strongly agree or agree with the introduction of a fortnightly collection service than all respondents (45%).
- Muslim respondents are less likely to live in a house (59% compared to 65%) with a wheelie bin and more likely to live a flat inside a block (24% compared to 9% when compared to all respondents. Buddhists are also more likely to live in a flat whether a converted (21% compared to 18%) or in a block (17% compared to 9%) when compared to all respondents.
- If changes are made to waste and recycling services Buddhists, Hindus and Jews are also in favour of stickers on bins after a letter or leaflet has been delivered to their door.



Analysis of the available qualitative feedback has revealed that there are no key issues that have been specifically attributed to religion or belief as a protected characteristic.

### **8. Sexual orientation**

Sexual orientation is defined as whether a person's sexual attraction is towards the opposite sex, their own sex or to both sexes. A summary of data on sexual orientation is set out in the box below.

#### **Data Summary for Sexual Orientation**

According to the 2011 Census:

- 1,162 (0.5%) of Lewisham residents are in a registered same-sex Civil Partnership;
- In the 2012 Annual Resident Survey, a question on sexual orientation showed that out of a total of 1,013 people, 97% identified themselves as heterosexual/ straight and 1% identified as being lesbian, gay or bisexual.

Analysis of responses to the survey questions by the protected characteristic of sexual orientation, revealed the following findings:

- Of the respondents to the consultation 4,133 indicated that they were straight or heterosexual, 288 that they were gay or lesbian, 78 bisexual and 25 other. More than 70% of respondents in each category indicated that recycling is very important to them.
- Bisexual individuals (44%) and those that indicated their sexual orientation as other (52%) are less likely to be satisfied to some extent with the current waste and recycling service compared to all respondents (65%). They also strongly agree or agree to a greater extent than all respondents that paper should be collected separately to allow for income generation.
- Respondents who indicated that they were straight/heterosexual (68%), bisexual (82%) or that their sexuality as other (68%) strongly agree or agree to a greater extent than all respondents (65%) that a food waste service should be introduced.
- Of the respondents indicating that they were bisexual, 50% strongly agreed or agreed that the council should charge for a garden waste service. This compares with (38%) of all respondents.
- Respondents who indicated that they were straight/heterosexual (47%), gay or lesbian (47%) and bisexual (52%) strongly agree or agree to a greater extent than all respondents (45%) that the council should introduce a fortnightly waste collection service.
- Of all respondents, 80% strongly agreed or agreed that properties without sufficient front garden space should still be offered a weekly food collection service if they want it, compared with 85% of respondents who indicated that they were gay or lesbian, and 89% of those who indicated that they were bisexual.
- All categories covered in the survey for sexual orientation are more likely to use a smartphone app i.e. greater than 10% for each category compared to 5% for all respondents.

Analysis of the available qualitative feedback has revealed that there are no key issues that have been specifically attributed to sexual orientation as a protected characteristic.

## 6. Implementation and Equalities Analysis Action Plan

The Equality Duty has three aims. It requires public bodies (e.g. local authorities) to have ***due regard to the need to:***

- i. **Eliminate unlawful discrimination**, harassment, victimisation and any conduct prohibited by the Act;
- ii. **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
- iii. **Foster good relations** between people who share a protected characteristic and people who do not share it.

Having due regard to the need to **advance equality of opportunity** involves considering the need to:

- Remove or minimise disadvantages suffered by people due to their protected characteristics;
- Meet the needs of people with protected characteristics; and
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is low.

In analysing the data, research and equalities monitoring from the Let's Talk Rubbish survey, and having due regard to Equality Duty, the following action plan has been developed should the proposed recommendations be approved at Mayor & Cabinet in January 2016.

**Table 5: Equalities Analysis Action Plan**

Possible Issues	Protected Characteristic Affected	Assessment of Potential Impact (+/-): High, Medium, Low, Neutral	Actions to be Taken	Expected Outcome
Physical ability to handle additional containers.	Age Disability	Medium (-)	Promote the Assisted Collections service so that those in need can access the service.	Assisted Collection service will be used by those in need.
Mental ability to understand a new collection system, especially if additional containers or frequency of collection changes.	Age Disability	Medium (-)	Ensure communications are in plain English and use alternative formats such as showing information pictorially and producing collection calendars so households can identify their collection dates.  Engage with amenity groups and target organisations who can assist people in understanding the services.  Consideration will be taken to make the service as easy to use by residents as is possible.	The service will be understood and utilised by those that may have difficulties in understanding a more complex system.
Impact of additional containers obstructing the pavement	Age Disability Pregnancy & Maternity	Medium (-)	The size and visibility of bins will be given consideration when designing new services.	Containers will be placed out and stored in the correct way.

			<p>Education as to the appropriate storage of bins will be given to householders.</p> <p>Consideration will be given to certain property types as to whether they will receive certain services and in what type of containers.</p>	
Volume of wastes for certain households if collection frequencies lessened e.g. nappies, bins becoming too heavy	Pregnancy & Maternity Age Disability	Low (-)	<p>Consideration will be given to additional bins for householders who may produce additional waste due to circumstance.</p> <p>Promote the Assisted Collections service so that those in need can access the service.</p>	Assisted Collection service will be used by those in need and temporary assisted collections may be provided if the need is justified.
Ability to understand information about services and how to access or utilise them	Age Disability Ethnicity	Medium (-)	<p>Ensure communications are in plain English and use alternative formats such as showing information pictorially.</p> <p>Engage with amenity groups and target organisations who can communicate service changes with their communities.</p>	Any changes to the service will be understood and will ensure high levels of participation.
Whilst bins for garden waste are seen as a positive for ease of use, the cost of garden waste service could be seen as too expensive	Age Disability	Low (-)	Benchmarking with other authorities will be undertaken and consideration for reducing the annual fee from that which was set out in the consultation will be given.	Engagement in the use of the garden waste service.

## 7. Conclusion

The adoption and implementation of the proposed waste and recycling service changes should pay due regard to the equality considerations highlighted in this assessment, to ensure that the council is compliant with its statutory obligations under the Equality Act 2010 and the equality objectives of the Comprehensive Equalities Scheme 2012-2016.

The Council will continue to consider the impact on all protected characteristics during the ongoing development and implementation of its' waste & recycling services should approval for change be granted in January 2016. Where appropriate it will undertake additional engagement with the community or more detailed equality analysis where the possibility of negative impacts on specific protected characteristics are identified.