



Assisted Collection Service EINA

Environment

2 November 2015

Equality Impact and Needs Analysis (EINA) for the Assisted Collection Service

Directorate:	Environment – Development and Street Scene
Service Area:	Waste and Recycling
Name of service/ function/ policy being assessed:	“Assisted Collection” policy for the collection of waste and recycling from kerbside serviced properties.
Officer leading on assessment:	David Ingham – Waste Minimisation Officer
Other staff involved:	Nigel Ray – Head of Waste and Recycling (LBRuT) Franco Murphy – Contract Manager (Veolia Env. Services) Stuart Black – Performance and Equalities Officer (LBRuT)

BACKGROUND

1. Briefly describe the service/ function/ policy:

The kerbside recycling and, to a lesser extent, kerbside refuse collection services provided Veolia Environmental Services on behalf of the London Borough of Richmond upon Thames (LBRuT) are designed to balance cost, efficiency and environmental impact with customer convenience.

To reduce collection costs, the standard instruction to residents is to place recycling containers at the front boundary of their property, as close to the pavement as practicable, so they are clearly visible from the road. This is referred to as a ‘curtilage collection’.

Residual waste is currently presented in either the front garden or to the side of a property. It need not be clearly visible from the road but should be identifiable on entering the property – referred to as a ‘go find’ service. However, residents are encouraged to present waste in the same way as their recycling (i.e. a curtilage collection) to aid service efficiency and reduce the risk of missed collections.

Some residents with physical impairments, particularly those affecting strength, dexterity, balance and general mobility, may have significant difficulty in complying with the standard LBRuT waste container presentation requirements.

To avoid discriminating against these service users, LBRuT has historically offered households that are unable to reasonably comply on these grounds with an “assisted collection”. This entails an offer to enter the resident’s property and retrieve waste and recycling from an agreed alternative presentation location – typically by an entrance at the front of the building (e.g. front or garage door) although other locations may be agreed on a case-to-case basis.

Collection crews are provided daily instructions that indicate addresses where assisted collections are required, accompanied with clarifying notes if necessary. The current system is also used to provide collection crews with access notes (e.g. gate codes for specific properties; or unusual locations/ access points of buildings e.g. back of property developments) to help avoid operational disruptions when providing a service to these properties.

Instructing collection crew members to travel further onto properties reduces the productivity of the crews. As such, the more assisted collections that are provided, the greater the chance that additional collection crews and vehicles will be required and therefore a greater cost will be incurred to deliver the service. For this reason LBRuT has aimed to provide assisted collection only to households that truly require this assistance.

2. Why is the equality impact and needs analysis being undertaken?

The process for assessing and recording the eligibility of households receiving assisted collections is being reviewed.

Preliminary work to review the process currently in place indicated that adequate efforts have not been made to ensure that only households truly in need of an assisted collection are allocated one, or continue to receive one over time, as the historic record system is not easily or routinely checked for continued entitlement.

Both of these issues could lead to an elevated and increasing number of avoidable assisted collection instructions and this may result in unnecessary contract costs. As such, the decision was taken to improve the process and procedures in place to avoid passing crews unnecessary assisted collection instructions.

As assisted collections support residents that may otherwise be excluded or disproportionately disadvantaged due to possessing one or more characteristics protected under the Equality Act 2010, it was deemed appropriate to conduct a full EINA to avoid unintended discrimination.

The key changes to the administration of the assisted collection provision that may impact on customers are:

1) Tightening up on the allocation of assisted collection requests so that they are allocated to households that are truly in need of this service.

Although this has been the intention since the start of the service, feedback has led to concerns that assisted collections have been provided based on the limitations or difficulties of a sole contact in a household, rather than consider or enquire about the collective ability of the household to comply with service presentation requirements.

The proposal is to improve Contact Centre scripting and web information and forms to better identify which households should be offered an assisted collection, and those households which could be encouraged to delegate responsibilities to avoid the need for this service. For example, if two adults live in a household and one is able to present the containers, they should take on this responsibility if the other resident is unable.

2) Put more emphasis and effort into identifying properties that need to be offered an assisted collection for a limited period.

Periodically reassess the need for continued assisted collections for properties with previously allocated collections that do not have an indicated duration.

Previously there has been no co-ordinated effort to record if assisted collections were allocated due to issues that may pass in time (e.g. an injury that should heal), or are likely to persist (e.g. mobility difficulties due to old age). This, combined with limited efforts to contact registered properties to review their service needs, has led to a gradual increase in the number of properties registered and will include a number that, due to changes to residency, will no longer require this service.

To reduce the impact on service productivity, all existing customers will be contacted to check they still require an assisted collection. Also, when new assisted collections are registered, we propose to build in automatic removal or review triggers. This could result in someone who has broken their leg receiving six months of assisted collections before they automatically drop off the active list, whereas a household, where age-related mobility issues are recorded as the reason for assistance, may be contacted every two years to ensure their situation has not changed (e.g. they have moved away).

It should be emphasised that all existing registered households, as well as new ones, will be required to confirm they meet assisted collection requirements.

3. SUMMARY OF THE KEY FINDINGS

Produce summary of key findings after you have undertaken the steps to produce the EINA.

There are no findings of unlawful discrimination – the assisted collection service benefits a number of residents without discriminating against any other groups.

The improved eligibility assessment may result in some residents losing access to the service, but this will be limited only to those who are unknowingly receiving an assisted collection or who have applied out of preference rather than because of a true need.

Through the process of applying eligibility criteria more robustly and consistently, the service will be made fairer for all residents and help ensure that those residents who need the service have access to it without incurring avoidable, unintended or disproportionate costs to the Council.

All current service users will be contacted prior to implementation of the new policy to ensure they are aware of the changes to the service.

4. Has this service/ function/ policy undertaken a screening for relevance?

A Screening for Relevance has been completed (see [Appendix 1](#)).

High relevance:

Eliminating discrimination, harassment or victimisation – the assisted collection service mitigates discrimination experienced by households who would otherwise be unable to take part in the recycling and, to a lesser extent, waste collection.

Advancing equality of opportunity – the assisted collections service allows households who would otherwise be unable to take part in the recycling and, to a lesser extent, waste collection process to participate in the same manner as any other household.

Fostering good relations – new eligibility criteria will ensure that those genuinely in need of the service will continue to benefit from assisted collections, whilst those households that unknowingly receive the service or receive it due to preference rather than need will be removed from the list.

5. What sources of information have been used in the preparation of this equality impact and needs analysis? For example, this could include equalities monitoring information, performance data, consultation feedback or needs assessment. Please provide the details in the table below:

Information source	Description and outline of the information source
Existing assisted collection records (Confidential)	An historic list of addresses receiving assisted collections, including pre-Contact Centre system entries with no background details (e.g. age of record, reason for support or contact details) and more recent requests for support made via the Contact Centre which may include the date of request, personal details/contact information and the reason for support.
Customer feedback (Confidential)	Fault reports, missed collections, complaints and complaints against policy and feedback via CSC and back office conversations with customers, which provide insight and personal contact for reference.

Information source	Description and outline of the information source
Contractor feedback	Collection crews provide supervisors with specific and anecdotal feedback about instances and trends of assisted collection properties that they suspect may no longer require an assisted collection.
Industry best practice	Provision of assisted collections as a way to support vulnerable residents is common across Local Authorities nationally. Sharing of best practice and experience is common between Officers.
Stakeholder consultation	In 2006, the Council consulted with older people and disability focus groups to seek insight into participation barriers and advice on appropriate mitigation.

ANALYSING IMPACT, NEEDS AND EFFECTS

It is important that the analysis addresses each part of the duty assessed as relevant to the area being examined.

6. Key questions to consider:

What does customer feedback, complaints or discussions with stakeholder groups tell you about the impact of the service/ function/ policy on the protected characteristic groups, where assessed as relevant to area being examined?

Are there any barriers to accessing services for any groups?

How well are diverse needs understood and met?

Do differences in service take up, feedback or satisfaction levels indicate that it is not accessible to certain protected groups, or does not meet their needs?

Are there population changes that might indicate new needs?

Have the needs of disabled people been identified and addressed where these are different from the needs of non-disabled people?

Is there any other evidence of differential impact or different outcomes which need to be addressed?

Are there opportunities to promote equality or improve participation?

Have you identified any need to tackle prejudice or promote understanding between different groups?

Protected Group	Findings
Age	Over 25,000 LBRuT residents (13.5%) are over 65 years of age, with 7,748 residents (4.1%) over the age of 80, which is of particular relevance to the assisted collections service. <u>Summary:</u> Older residents are more likely to be unable to participate in the kerbside services. This is due to general loss of strength or mobility due to the effects of ageing, which can make it harder for them to lift and move containers from inside their property to the front boundary, as directed by our standard service requirements. Older residents are also more likely to develop acute or longer-lasting symptoms, when suffering from an injury or illness, which may impair their ability to move waste containers.

	<u>Description of risk factors and mitigation related to delivery of service:</u> Older residents are more likely to experience reduced strength, dexterity, balance and overall mobility as a natural part of ageing. These factors may reduce their ability to manipulate and move containers to the edge of their property (curtilage collection). Older residents are also perceived to have a heightened risk of developing chronic medical conditions, or to take longer to recover from accidents or operations that may, temporarily or permanently, reduce strength, dexterity and general mobility. An assisted collection allows a household to leave containers at an exit at the front of their property (e.g. front or garage door). This minimises any carry distance, particularly if the containers can be left permanently in-situ and filled, item by item, between collections. Leaving containers in place at the agreed assisted collection presentation point between collections can also help residents that may struggle to remember collection days to avoid a missed collection as the containers are always presented. This can be of assistance to carers that may not be aware of collection days and may not be willing to spend time to facilitate recycling for the household. These households may also find it more difficult to report a missed collection, so limiting the likelihood of these is an additional benefit. <u>Description of risk factors and mitigation related to changes to accessing and administration of the service:</u> As the service provides important assistance to vulnerable residents, officers recognise the need to ensure that sufficient effort is made to effectively reach all currently registered households to inform them about the new ongoing review processes and any new criteria for confirming the continued need and eligibility for this service. From experience with other communication activities and customer feedback, older residents are more likely to: • Not answer unsolicited calls or withheld number telephone calls; • Be less likely to refer to the Council website for service information, news or announcements; • Prefer posted, printed, large print communications. For these reasons, all registered households (both age and disability) will be: • Written to via Royal Mail and invited to respond via all available communication channels. In addition to this: • Properties that have a record of activity associated with the assisted collection service (e.g. recent requests for assisted collection service, missed collections or service faults referring to status) but have not responded will be contacted via telephone (if the overall number of non-responding properties is small, all may be called). • Information about the changes to applying for the assisted collection service will be made available online. • Officers will be seeking to make key internal departments and any external organisations that may advise and refer residents to register for assisted collections aware of these changes and actions.
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Protected Group	Findings
Disability	In the 2011 Census, 21,447 (11.5%) of LBRuT residents stated they had an illness or disability that limited their day-to-day activities (although it should be noted that, under the eligibility criteria, not all of these are entitled to an assisted collection). The risk factors and mitigations considered above (see “Age”) are transferable to properties where the resident has a disability that impairs their ability to move containers. As well as assisting disabled residents to access services directly, an additional benefit of the assisted collection service is to allow containers to be left in-situ. This provides the opportunity for carers to assist disabled residents to participate in recycling collections, without the need to schedule care commitments to coincide with collection days. Therefore, assisted collections can overcome a significant barrier to participation, as planning care arrangements around collection days to allow participation in recycling is not a priority, compared to other needs or practicalities. Also see “Age” section for related actions.
Gender (Sex)	No impact has been identified for this protected characteristic.
Gender reassignment	No impact has been identified for this protected characteristic.
Marriage and civil partnership ¹	No impact has been identified for this protected characteristic.
Pregnancy and maternity	As there are no major hospitals within the boundaries of LBRuT, the vast majority of pregnant residents give birth (and, therefore, register the birth) in neighbouring boroughs. As such, there are no accurate statistics for the number of pregnant residents. However, we know from the 2011 Census that there are 5,850 residents under 2 years of age, which can provide an approximate representation of residents in this category. Pregnancy can result in reduced mobility and difficulty in handling waste and recycling containers, which can continue for some time after childbirth. An assisted collection can minimise the amount of handling and distance of carry. Assisted collection applications that are approved on the basis of pregnancy and maternity are likely to be time tentative (e.g. withdrawn after 12 months, unless there are extenuating reasons to prolong the provision).
Race/ethnicity	No impact has been identified for this protected characteristic.
Religion and belief (including non-belief)	No impact has been identified for this protected characteristic.
Sexual orientation	No impact has been identified for this protected characteristic.

¹ Only in relation to the first part of the duty: eliminate discrimination, harassment and victimisation

7. Have you identified any data gaps in relation to the relevant protected characteristics and relevant parts of the duty?

If so, how will these data gaps be addressed? What further information is needed to enable a robust equality analysis of the area?

Gaps in data	Action to deal with this
Uncertainty over the number of households who should be receiving assisted collections.	Contact all households currently receiving assisted collections to clarify why this service should continue.

8. CONSULTATION IN THE EINA PROCESS

What consultation have you undertaken with stakeholders or critical friends to help inform the EINA process? What feedback did you receive as part of the consultation?

Consultation has taken place with:

- Equality Stakeholder Scrutiny Group (ESSG)
- Performance and Equalities Officer (LBRuT)
- Veolia Environmental Services (current waste and recycling collection contractor)

Feedback has been included in the final draft of this document.

ACTION PLANNING

9. What issues have you identified that require equality actions? What are these equality actions, who will be responsible for them and when will they be completed?

Issue identified	Planned action	Lead officer	Completion Date
The types of containers provided are not always optimal for individual service users.	Type of container provided to service users to be considered when new service contract is tendered.	Colin Bartlett	TBC
Currently registered households may not be aware of changes to the service.	All registered households to be contacted via Royal Mail to inform them of changes to the service / reassessment of eligibility.	David Ingham	Completed (March 2014)
	Contact by telephone the most vulnerable and recently recorded service applicants or those with recent contact records who do not reply to mail-out.	Contact Centre	Completed (June 2014)
List of residents receiving assisted collections not accurate (based on eligibility criteria)	Ensure list of residents receiving assisted collections is up-to-date and based on revised eligibility criteria.	Arlon Skeete	On-going
No information about assisted collections is available online.	Update assisted collections webpage on Council website to provide information about the service.	David Ingham	Completed (April 2014)
Internal departments and external organisations that refer residents to service may not be aware of changes.	Ensure key referral partners are made aware of changes to the assisted collection service and eligibility assessment.	Nigel Ray	Completed (June 2014)

MONITORING AND REVIEW

10. How will the actions in the action plan be monitored and reviewed? For example, any equality actions identified should be added to business, service or team plans and performance managed.

The Waste Service will undertake regular monitoring of the requests made by residents to receive assisted collections, to ensure those residents that need it benefit from the service.

Assisted collections will be a regular agenda item at contract operational review meetings.

The Environment Equality and Diversity Steering Group (EEDSG) will monitor the progress on actions recorded in this EINA.

PUBLISHING THE FULL COMPLETED ANALYSIS

Please note that after completion of EINA findings, a member of DMT can approve the equality analysis, in order to inform further stages of a decision making process. Once fully completed as part of a final decision making, EINA can be published on the Council website. Please also note that various stages of the EINA process can accompany decision making at Cabinet/Committee levels and can be published as part of that decision. Once it is in the public domain it can be open to scrutiny.

Please provide details below:

Approved by	Jon Freer, Assistant Director of Environment (Development and Street Scene)
Date of approval	13 th March 2015
Date of publication	2 nd November 2015 (revised)

DECISION-MAKING PROCESS

11. Has a copy of this EINA or summary of key findings been provided to key decision-makers, where relevant, to help inform decision making, for example as an appendix to a Cabinet or Committee report or report for DMT or Exec Board?

Not applicable.

Screening for Relevance

Name of Directorate	Environment		
Contact	David Ingham – Waste Minimisation Officer	Telephone	020 8487 5239
		Email	d.ingham@richmond.gov.uk

Service/ Function	Are the areas listed below relevant to your service/ function?											
	Please answer H, M or L for ‘High’ Medium or Low’											
	Age	Sex	Race	Disab’	Re&B	SO	GeR	P&M	M&CP	Eliminating discrimination, harassment or victimisation	Advancing equality of opportunity between different groups	Fostering good relations
Assisted Collections	H	L	L	H	L	L	L	H	L	H	H	H

Legend			
Age	Age	Sex	Sex
Race	Race	Disab’	Disability
Re & B	Religion and Belief	SO	Sexual orientation
GeR	Gender re-assignment	P&M	Pregnancy and maternity
M&CP	Marriage and civil partnership		