

## Appendix 2 Integrated Impact Assessment Form (IIA)

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement that

***‘The needs of Luton’s people will be first in everything we do’.***

### **Why do I need to do an IIA?**

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens.
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion.
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified.

### **When do I need to do an IIA?**

- An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.
- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and all impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed and you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is unlikely you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens.
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit.

**If you need further guidance please contact the Social Justice Unit (SJU). Please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.**

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<b>Proposal Title:</b>	Charging for Garden Waste collection
<b>Lead Officer Name:</b>	Ricky Devlin
<b>Date of IIA:</b>	25 <sup>th</sup> August 2020

<b>Date updated after consultation:</b>	26 <sup>th</sup> October 2020
<b>Early draft Seen by:</b> <i>(Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time)</i>	

<b>Finalised IIA Signed and seen by SJU :</b>	
<b>Name:</b>	Sandra Hayes
<b>Date</b>	17 <sup>th</sup> November 2020

<b>Names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and agreed this assessment:</b> <i>(Please note the IIA must not be carried out by one person)</i>	Ricky Devlin James Lucas
<b>If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:</b>	

### Proposal Outline

Information supporting the proposal (who, what, where, how). Breakdown of present users by ethnicity, age, gender, disability, religion/belief, sexuality (if recorded). Show areas in the town with the biggest and lowest needs. Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered.

If agreed by members, an introduction of a chargeable garden waste collection service would begin in March 2021.

## Current Service

1. The council currently provide a free and discretionary service to approx. 64,000 of the 83,000 homes within the borough, flats and communal managed areas do not currently benefit from this service as there is either no waste produced due to the type of property or the waste that is produced is disposed of by the communal land owner.
2. Collections currently take place fortnightly between the months of March and November (9 months) each year on a seasonal basis.
3. Residents are currently supplied with a 240 litre brown bin for the collection of their garden waste.
4. There are currently four x 3 person collection crews that collect garden waste that consist of 4 x LGV Drivers (L4) and 8 x Refuse collection operatives (L2). (12 Staff)

## Proposed Service

5. Should Executive approve a chargeable garden waste service, the existing free service will end immediately. At the current time garden waste collections are suspended for the winter months, but a chargeable service will commence from the beginning of March 2021.
6. The service would run on an opt-in basis which residents would only subscribe to if they wished to continue using the service.
7. Collections would continue to remain fortnightly on a seasonal basis between the months of February through November each year. This would be an increase of one month in comparison to the current free service.
8. Residents would be charged a fee of £40 per bin annually and no concessions will be offered.
9. Payment options will be by card, either via the online webpage or over the phone for those without access to the internet.
10. Residents would receive a permit for each subscribed bin which would need to be applied to the body of the bin. The permit along with in-cab collection software will determine and identify to collection crews who is in the scheme.
11. The scheme would have a dedicated email address for customer queries and complaints.
12. Existing bins will not be removed from customers who choose not to subscribe unless they specifically request this.
13. All new and replacement garden waste bins will incur a charge of £20 unless the loss or damage has been caused by the council.
14. Residents who choose not to opt-in to the scheme would still continue to have other options available to them to dispose of their garden waste. These options include;
  - **Home compost** through the councils free or subsidised home composting container
  - **Self-delivery** of waste to one of the two tidy tips within the town

## Impact Table

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and the Council's Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts<sup>1</sup>, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			X
Gender			X			X
Disability		X				X
Sexual Orientation			X			X
Age		X				X
Religion/Belief			X			X
Gender Reassignment			X			X
Pregnancy/Maternity			X			X
Marriage/Civil Partnership (HR issues only)			X			X
Care Responsibilities <sup>2</sup> (HR issues only)			X			X
Social & Health <sup>3</sup>						
Impact on community cohesion			X			
Impact on tackling poverty			X			
Impact on health and wellbeing			X			
Environment						
Impact on the quality of the natural and built environment			X			
Impact on the low carbon agenda	X					
Impact on the waste hierarchy		X				
Economic/Business						
Impact on Luton’s economy and/or businesses	X					
Impact on jobs			X			
Impact on skills			X			

<sup>1</sup> "Significant impact" means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

<sup>2</sup> This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

<sup>3</sup> Full definitions can be found in section 3

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Please answer the following questions:

<b>1. Research and Consultation</b>
1.1. Have you made use of existing recent research, evidence and/or consultation to inform your proposal? Please insert links to documents as appropriate.
<a href="#"><u>Click here for local demographics and information</u></a>
A public consultation was carried out via the council's website/paper copy between the dates of Monday 28 <sup>th</sup> September and Sunday 25 October 2020 (4 Weeks). In total there were 2722 responses to the consultation, 2720 via the online portal and 2 paper responses.
A full copy of the analysis report can be found at Appendix 2 that accompanies this document.
1.2. Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).
<b>Guidance Notes:</b> <i>If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.</i>
<a href="#"><u>Click here for the LBC Consultation Portal</u></a>
A public consultation was carried out via the council's website/paper copy between the dates of Monday 28 <sup>th</sup> September and Sunday 25 October 2020 . In total there were 2722 responses to the consultation, 2720 via the online portal and 2 paper responses.
A full copy of the analysis report can be found at Appendix 2 that accompanies this document.
1.3. Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.
<a href="#"><u>For advice and support from Consultation Team click here</u></a>
A public consultation was carried out via the council's website/paper copy between the dates of Monday 28 <sup>th</sup> September and Sunday 25 October 2020. In total there were 2722 responses to the consultation, 2720 via the online portal and 2 paper responses.
A full copy of the analysis report can be found at attached to the report at Appendix 2.

<b>2. Impacts Identified</b>
2.1. Where you have identified a <b>positive</b> impact, for <b>communities or staff</b> , please outline how these can be enhanced and maintained <b>against each group identified</b> . Specific actions to be detailed in action plan below.
<b>Guidance Notes:</b> By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?
N/A
2.2. Where you have identified a <b>negative</b> impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be <b>against each group identified</b> . You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.
<b>Guidance Notes:</b> By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?
It is possible that some groups such as the elderly or disabled may have difficulties accessing the option of disposing of garden waste at the Household Waste Recycling Centres. To mitigate this the Council has committed to offering up to 2000 compost bins free of charge which in the first instance will be offered through community organisations representing these groups.
2.3. Where you have identified a <b>neutral*</b> impact for any group, please explain why you have made this judgement. You need to be confident that you have provided a sufficient explanation to justify this judgement.
<b>Guidance Notes:</b> By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic
<p><b>Communities;</b> The service will still be provided to residents on an opt-in basis. Therefore will have a neutral impact on the community.</p> <p><b>Staff;</b> There will be no full time redundancies as a result of the implementation of this proposal, therefore will have a neutral impact on staff.</p>

<b>3. Social &amp; Health Impacts</b>
3.1. If you have identified an impact on community cohesion <sup>4</sup> , tackling poverty <sup>5</sup> or health and wellbeing <sup>6</sup> , please describe here what this may be and who or where you believe could be affected, <b>Please also ensure that you consider any possible impacts on Looked After Children.</b>
<p><b>Guidance Notes:</b> Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.</p> <p><a href="#">For advice &amp; support from the Social Justice Unit click here</a></p> <p><a href="#">For advice and support from the Public Health team click here</a></p>
No associated impacts

<sup>4</sup> is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

<sup>5</sup> is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

<sup>6</sup> Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?



## 4. Environment Impacts

4.1. If you have identified any impacts related to the built and natural environment<sup>7</sup>, low carbon<sup>8</sup> and waste minimisation please describe here what this may be and who or where you believe could be affected

**Guidance Notes:** Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

### Waste Hierarchy



[For advice and support from the Strategy & Sustainability Team click here](#)

### Impact on the low carbon agenda; **POSITIVE**

As a result of the projected reduction of households requiring the service, collection vehicles would be reduced which would lead to a positive impact on the environment.

### Impact on the quality of the natural and built environment; **NEGATIVE**

As part of the proposed introduction of a charge for the collection of garden waste, it is envisaged that there may be an increase in fly-tipping and/or garden fires where people seek to find alternative measures to dispose of their garden waste. However, as there is alternatives in place in the form of residents being able to home compost or dispose of their waste at the towns HWRC (Tidy Tip), the impact is envisaged to be low to medium.

<sup>7</sup> Is the proposal likely to Impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution.

<sup>8</sup> Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

<p><b>5. Economic Impacts</b></p>
<p>5.1. If you have identified any impacts related to Luton's economy and businesses <sup>9</sup>, creating jobs<sup>10</sup> or improving skill levels <sup>11</sup>, please describe here what this may be and who or where you believe could be affected</p>
<p><b>Guidance Notes:</b> Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below. Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below.</p> <p><a href="#">For advice and support on Economic Development click here</a></p>
<p><b>Impact on Luton's economy and/or businesses; POSITIVE</b></p> <p>If introduced the scheme would provide extra revenue to the council.</p>

<sup>9</sup> Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

<sup>10</sup> Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

<sup>11</sup> There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

### Impact Enhancement and Mitigation

Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below:

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed / Ongoing
Need to monitor alternative method of disposal for the 65% of residents who indicate they are unlikely to buy into the garden waste recycling scheme.	Ongoing	Waste Management Officers	To ensure that alternative methods of disposal continue to be made readily available to mitigate the risk of a negative impact on the environment.	Ongoing

A review of the action plan will be prompted 6 months after the date of completion of this IIA.

### Key Contacts

Name	Position
James Lucas	Refuse Collection Manager
Alex Greene	Service Manager-Street Scene

### Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager

Completed and signed IIA's will be published on the internet once the democratic process is complete

### Useful Documents

[Corporate Plan](#)

[Equality Charter](#)

[Social Justice Framework](#)

[Family Poverty Strategy](#)

[Joint Strategic Needs Assessment \(JSNA\)](#)

[Community Involvement Strategy](#)