

City of York Council

Equalities Impact Assessment

Who is submitting the proposal?

Directorate:		Environment, Transport and Planning	
Service Area:		Environmental Services – Waste Services	
Name of the proposal :		Garden Waste Subscription Scheme	
Lead officer:		Ben Grabham; Head of Environmental Services	
Date assessment completed:		19 th December 2024	
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Ian Hoult	Head of Fleet and Operations	City of York Council	Fleet/Operations
Rebecca Copley	Business Manager; Environmental Services	City of York Council	Business Management, Communications
Suzanne Middleton	Strategy and Development Manager	City of York Council	Strategy and Development, Business Processes

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	The Council operates a subscription scheme for garden waste collections in York. This opt-in scheme has an annual charge for kerbside garden waste collections in York. If residents want to have their garden waste bin collected by the Council they need to subscribe for the garden waste bin(s) to be emptied. Charges are made on a per bin basis.
1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	The collection of garden waste is not a statutory service and under the Controlled Waste Regulations 2012, the Council has the discretion to charge for this service. It is also important to point out that the Government consulted on its Waste and Resources Strategy in 2021 and a recent Government response in November 2023, outlined that “local authorities will be required to provide a garden waste service where it is requested but as is currently the case, they can continue to choose to charge for the service”.
1.3	Who are the stakeholders and what are their interests?
	All residents of York are considered to be stakeholders. Residents have a choice as to whether they subscribe to the garden waste subscription scheme (there is a discount available for residents in receipt of Council Tax Support or those who are registered as SMI (severe mental impairment). Residents can also choose to compost their garden waste at home (discounted home composters can be purchased through the Council) or they can dispose of garden waste at a household waste recycling centre (for free). In addition, residents can also share a garden waste subscription with a neighbour.
1.4	What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.

	<p>As part of the Council's four core commitments and in line with the Council Plan:-</p> <ul style="list-style-type: none"> • Equalities and Human Rights - Equality of opportunity – previously garden waste was not available to all households and the fact that some properties remain on a bagged waste service means we cannot provide garden waste collections to these properties. • Affordability – Whilst charging for kerbside garden waste collections through the garden waste subscription scheme may have some negative impacts for those on a low income there are environmentally friendly, cost effective and free alternatives to subscribing such as home composting and/or disposal at a household waste recycling centre. The Council has discounted home composters available (which are cheaper than the items can be sourced independently; these can be purchased for £15). There is also a 50% discount on the subscription fee for the garden waste subscription scheme for residents in receipt of Council Tax Support and this 50% discount also applies to residents registered with a Severe Mental Impairment (SMI). An option to share a bin with a neighbour is also available. • Climate - Environment and the climate emergency – Reducing the mileage and making the service more efficient through optimising collection routes and rounds will have benefits for the environment and carbon and other emissions will be reduced. By focussing collections in an area of the city will enable a review of the way public realm management and service delivery is undertaken. Reducing the number of properties on a bagged collection is expected to increase levels of recycling in those areas.
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Step 2 – Gathering the information and feedback

2.1	<p>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.</p>	
	Source of data/supporting evidence	Reason for using
	Comparison to other local authorities	Over 70% of local authorities in England charge for garden waste collections at the kerbside. In terms of a local context, all other authorities in North Yorkshire charge for garden waste collections.

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.		
Gaps in data or knowledge		Action to deal with this	
<ul style="list-style-type: none"> The Council knows which households currently subscribe to the garden waste subscription scheme but does not know exactly which residents dispose of garden waste through other means The Council does not know which households compost garden waste at home as this is individual choice The Council does not know how many households do not generate garden waste at all (e.g. in that they do not have a garden or have made the individual choice to pave their garden or alternatives such as artificial grass etc) 		<p>The Council can monitor how much garden waste is collected at the kerbside and can also monitor garden waste collected at household waste recycling centres.</p> <p>The Council can also monitor how many discounted home composters are purchased (through the Council).</p> <p>It will be important for this monitoring to continue so that the impact of the scheme can be effectively assessed over time.</p>	

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Any residents who receive an assisted collection for their bins will continue to receive this if they subscribe to the service. There will also be a discount available on the subscription rate for the garden waste	(0)	

	subscription scheme for residents in receipt of Council Tax Support (CTS) and those who are registered as SMI.		
Disability	Any residents who receive an assisted collection for their bins will continue to receive this if they subscribe to the garden waste subscription scheme.	(0)	
Gender	n/a	(0)	
Gender Reassignment	n/a	(0)	
Marriage and civil partnership	n/a	(0)	
Pregnancy and maternity	Any residents who receive an assisted collection for their bins will continue to receive this if they subscribe to the garden waste subscription scheme.	(0)	
Race	n/a	(0)	
Religion and belief	n/a	(0)	
Sexual orientation	n/a	(0)	
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer		(0)	
Low income groups	There is a 50% discount available on the subscription fee for the garden waste subscription scheme for residents in receipt of Council Tax Support and classed as SMI. Residents can also share a garden waste subscription with their neighbours if they so wish as a means to reduce the cost.	(-)	(L)

	If residents do not wish or cannot afford to subscribe to the garden waste subscription service, then there are other alternatives which are available for the free disposal of garden waste (e.g. home composting and/or disposal at a household waste recycling centre). Discounted home composters (which are cheaper than available on the open market) can be purchased through the Council for a one-off fee (£15).		
Veterans, Armed Forces Community		(0)	
Other	Residents who do not have a vehicle and cannot access the household waste recycling centre can either compost garden waste at home or share a garden waste subscription with a neighbour. Discounted home composters (which are cheaper than those available on the open market) can be purchased through the Council for a one-off fee (£15).	(-)	(L)
Impact on human rights:			
List any human rights impacted.	n/a		

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
<p>The options for alternatives to subscribing to the garden waste subscription scheme have been identified throughout the document. By operating a subscription service, the Council is able to extend the offer of a garden waste service to more properties across the city (as the garden waste service was at capacity). In addition, moving to a subscription service will allow the Council to generate an income to cover the cost of providing the garden waste service (which is much valued by householders) and help to protect other services delivered by the Council.</p>	

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
<p>- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p>	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
<p>No major change to the proposal – the EIA demonstrates the proposal is robust.</p>	<p>Operating a garden waste subscription scheme for the collection of garden waste from the kerbside is a relatively low charge, as it is an annual charge for service. Residents have a choice as to whether they subscribe to the garden waste subscription scheme or not.</p> <p>There is a 50% discount available on the subscription fee for the garden waste subscription scheme for residents in receipt of Council Tax Support or classed as SMI. If residents do not wish to or cannot afford to subscribe to the garden waste subscription scheme, then there are other alternatives which are available for the free disposal of garden waste (e.g. home composting and/or disposal of garden waste at a household waste recycling centre). Discounted home composters are available for a fee of £15 (which is cheaper than the market rate). Residents could share a garden waste subscription with their neighbours if they so wish as a means to reduce cost.</p>

Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.		
Impact/issue	Action to be taken	Person responsible	Timescale
n/a			

Step 8 - Monitor, review and improve

8.1	<p>How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?</p>
	<ul style="list-style-type: none"> • The Council will review the number of households that subscribe to the garden waste subscription service. • The Council will review the number of households in receipt of Council Tax Support or registered as SMI that subscribe to the garden waste subscription service. • The Council will also continue to monitor the amount of garden waste that is collected at the kerbside alongside the amount of garden waste that is taken to the household waste recycling centres in the city. • The Council will keep a record of home composters that are purchased through the Council. • The Council will continue to monitor if there is an increase of incidence of fly tipping of garden materials (it should be noted that no increase in fly tipping was observed when the garden waste subscription scheme was introduced). • The Council will offer a one-off take back of unwanted garden waste bins, at the end of the 2025 garden waste season, from those households who have a garden waste bin but do not want to subscribe to the garden waste subscription scheme (it is likely that residents will need to register for this but further details will be communicated later in 2025). • The Council will make 'reasonable adjustments' to make the service available to those with physical limitations.

