

## Equality Impact Analysis Screening Tool

### Section 1: Introduction

<b>Name of proposal</b> For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Tower Hamlets Reduction and Recycling Plan 2023-2025 (RRP)
<b>Service area and Directorate responsible</b>
Operational Services, Place
<b>Name of completing officer</b>
Louise Houston, Environmental Services Improvement Team Leader
<b>Head of Service</b>
Richard Williams, Business Manager Operational Services

**The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:**

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

### Section 2: Summary of proposal being screened

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010
<b>2.1 Introduction</b>

Developing and producing an RRP is a requirement set by the GLA to ensure all London authorities are in general conformity with the London Environment Strategy. This second RRP covers a two-year period from April 2023 to the end of March 2025.

The RRP comprises environmental metrics drawn from the previous reporting cycle (2018-2022) along with plans to improve services and support residents to reduce their waste and recycle more. Some of these plans address expected national waste and recycling reforms outlined in the Government's Resources and Waste Strategy for England (2018).

The impacts of RRP actions on general equality duties and protected characteristics have been considered and are discussed below.

## **2.2 Housing**

88.7% of households in Tower Hamlets live in a flat, maisonette or apartment, the second highest proportion in England and Wales after the City of London and was twice the proportion in the London region. The London average is 56%.

On average flat dwellers recycle half as much as those living in houses (ReLondon 2018).

Tower Hamlets has a high proportion of households who rent, both from social landlords and from private landlords whereas the proportion of owner occupiers is the lowest in England and Wales. 35.9% of households live in social rented accommodation and 38.2% of households live in private rented accommodation. Social and private renting is significantly higher in Tower Hamlets than the London and England and Wales average.

Tower Hamlets has the third highest number of HMOs in London. Census 2021 data indicates that there are 4,734 houses of multiple occupation in the borough. Tower Hamlets also has a greater proportion of larger households than both London and England and Wales. Houses with large families and HMOs are likely to be producing a larger amount of waste and recycling and require more storage capacity.

The RRP Actions (below) will seek to improve service provision equality for people living in flats.

- RRP Action #1: Improving recycling infrastructure for blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions. These improvements will include increased storage capacity and signage, where possible.
- RRP Action #3: Rolling out food waste collection service to purpose-built blocks of flats.
- RRP Action #7: Improving service delivery - Flats above shops (FAS)
- RRP Action #6: Review and expand garden waste collection service to increase recycling
- RRP Action #17 Improving waste reduction and recycling arrangements in new developments

There are two actions that will seek to improve service provision for kerbside properties, which are mostly houses converted into flats or houses.

- RRP Action #2: Increasing participation in the kerbside food waste collection service through re-promotion of the service
- RRP Action #5: Reviewing service offer to kerbside properties to increase recycling

## **2.3 Age - Young people**

11.1% of children in the borough are aged between 5-14 years of age. The schools recycling programme will seek to engage this group and their parents/carers. Messages given to children at school may be taken home and result in behaviour changes in the household.

RRP Action #12: Education and behaviour change - Schools recycling programme

A UK-wide report in 2017 by SERCO found that less than half of all 16-34 year olds admitted that they do not recycle 'all that they can'. New poll shows millennials are least likely age group to recycle (serco.com).

3 RRP Action #10: Reuse, repair and recycling activities and events

### **Age - Older people**

5.7% of the population are over 65. This cohort may find it more difficult to manage waste and recycling infrastructure due to age-related disabilities. In addition, this cohort may make greater use of items such as disposable medical products.

Members in this group may find it difficult to access information about services online, we therefore ensure that our communications include traditional printed media such as leaflets, posters and Our East End.

A clinical waste collection service and assisted collections are in place and will not be impacted by the RRP.

### **2.4 Race**

There is a higher proportion of Asian, Asian British or Asian Welsh: Bangladeshi in Tower Hamlets than in London, and a lower proportion of White: British.

46.8% of residents were born outside of the UK. 7.8% have been resident in the UK for less than 2 years at the time of the census. The most common countries of birth other than the UK were Bangladesh, Italy, India, China and France. 14% of residents were born in a current EU country.

There may be potential language barriers and cultural differences, which may impact on recycling participation. This could be positive or negative because different cultures may have different purchasing or dietary habits.

Communication about recycling services is regularly reviewed and refreshed with consideration always given on how to be inclusive and representative of the community, including those with language barriers. For example, the "Let's rethink it!" campaign is currently raising awareness about correct recycling behaviours using outdoor and online advertising. A video about why it is important not to contaminate your recycling is being developed, with versions in both English and Bengali. All designs include imagery that is inclusive and reflects or diverse community.

We will seek to engage with different groups through targeted attendance at events/venues, partnership working with community groups and multi-channel communication. Engagement of recycling champions that reflect our borough may lead to increased participation in waste reduction, food collections and recycling services. Messages given to children at school may be taken home and result in behaviour changes in the household.

- 3 RRP Action #11: Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme
- 4 RRP Action #10: Reuse, repair and recycling activities and events
- 5 RRP Action #12: Education and behaviour change - Schools recycling programme

## **2.5 Language proficiency in English**

The most commonly spoken main languages other than English were Bengali (11%), Italian (2.2%), Spanish (1.7%), French (1.2%), and Portuguese (1%).

27% said they did not speak English as their first language. 5.2% of residents aged 3 and over said they could not speak English well and 1% said they could not speak English at all.

Improvement to infrastructure at blocks of flats includes provision of signage and new bin stickers with clear pictures which will help those with language limitations. We will continuously review our communications activities and seek to be inclusive e.g. attending ESOL events. Engagement of recycling champions that reflect our borough may lead to increased participation in waste reduction, food collections and recycling services.

- 3 RRP Action #1: Improving recycling infrastructure for blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions
- 4 RRP Action #10: Reuse, repair and recycling activities and events
- 5 RRP Action #11: Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme

## **2.6 Disability**

The proportion of residents in Tower Hamlets whose day-to-day activities are limited (a little and a lot) is slightly lower than the London average. The proportion of residents living in the borough with bad/very bad health is on a par with the London average.

12.9% of residents had a disability and 25.7% of households had at least one disabled person living within them.

Residents with reduced mobility due disability may find it more difficult juggle their waste and recycling from their home to the waste and recycle facilities. They may also struggle to manage the waste and recycling infrastructure (bins). Some residents with a disability may produce a greater amount of waste as a result of their disability (e.g. using disposable medical waste or sanitary products (including incontinence pads).

A clinical waste collection service and assisted collections are in place and will not be impacted by the RRP.

## **2.7 Religion or philosophical belief**

Islam (39.9%) is the most common religion in Tower Hamlets.

There may be potential language barriers and cultural differences, which impact on recycling participation. This could be positive or negative because different cultures may have different purchasing or dietary habits.

We will engage with faith groups to identify and create a calendar/action plan of activities.

- 3 RRP Action #11: Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme
- 4 RRP Action #10: Reuse, repair and recycling activities and events
- 5 RRP Action #17: Collaboration with faith groups to promote recycling and waste reduction

## Section 3: Equality Impact Analysis screening

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below?</p> <p>Please consider the impact on overall communities, residents, service users and Council employees.</p> <p>This should include people of different:</p>	Yes	No	Comments
<ul style="list-style-type: none"> <li>▪ <b>Sex</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Sex.</p>
<ul style="list-style-type: none"> <li>▪ <b>Age</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p>

			<p>Please refer to section 2.3.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Age.</p>
<ul style="list-style-type: none"> <li>▪ <b>Race</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Please refer to section 2.4.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Race.</p>
<ul style="list-style-type: none"> <li>▪ <b>Religion or Philosophical belief</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Please refer to section 2.7.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Religion or Philosophical belief.</p>
<ul style="list-style-type: none"> <li>▪ <b>Sexual Orientation</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Sexual Orientation.</p>
<ul style="list-style-type: none"> <li>▪ <b>Gender re-assignment status</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents,</p>

			service users or Council employees on the grounds of Gender re-assignment.
<ul style="list-style-type: none"> <li>▪ People who have a <b>Disability</b> (physical, learning difficulties, mental health and medical conditions)</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Please refer to section 2.6.</p> <p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees on the grounds of Disability.</p> <p>Residents with disabilities already have access to assisted waste and recycling collection services.</p>
<ul style="list-style-type: none"> <li>▪ <b>Marriage and Civil Partnerships</b> status</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees on the grounds of Marriage and Civil Partnership status.</p>
<ul style="list-style-type: none"> <li>▪ People who are <b>Pregnant</b> and on <b>Maternity</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees who are Pregnant or on Maternity.</p>
<p>You should also consider:</p> <ul style="list-style-type: none"> <li>▪ <b>Parents and Carers</b></li> <li>▪ <b>Socio-economic</b> status</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Housing is one of the measures of deprivation. Please refer to section 2.1.</p>

<ul style="list-style-type: none"> <li>▪ People with different <b>Gender Identities</b> e.g. Gender fluid, Non-binary etc.</li> <li>▪ Other</li> </ul>			<p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees who are Parents and Carers or people with different Gender Identities or Socio-economic status.</p>
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If you have answered **Yes** to one or more of the groups of people listed above, a **full Equality Impact Analysis is required**. The only exception to this is if you can 'justify' the discrimination (Section 4).

## Section 4: Justifying discrimination

Are all risks of inequalities identified capable of being justified because there is a:	
(i) <i>Genuine Reason</i> for implementation	<input type="checkbox"/>
(ii) The activity represents a <i>Proportionate Means</i> of achieving a <i>Legitimate Council Aim</i>	<input type="checkbox"/>
(iii) There is a <i>Genuine Occupational Requirement</i> for the council to implement this activity	<input type="checkbox"/>

## Section 5: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

### Conclusion details

Based on your screening does a full Equality Impact Analysis need to be performed?

Yes	No
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<input type="checkbox"/>	<input checked="" type="checkbox"/>
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If you have answered **YES** to this question, please complete a full Equality Impact Analysis for the proposal

If you have answered **NO** to this question, please detail your reasons in the 'Comments' box below

Comments
There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees with any protected characteristic. The actions in the RRP will have a positive impact on services and the environment.