

EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Cleaner Haringey Strategy
Service area	Waste Client, Community Safety & Enforcement
Officer completing assessment	Steve Baker
Equalities/ HR Advisor	Edward Ashcroft
Cabinet meeting date (if applicable)	9 March 2021
Director/Assistant Director	Stephen McDonnell / Eubert Malcolm

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

The Cleaner Haringey Strategy outlines the approach that the Council will take to deliver a cleaner borough. With an overarching theme of strengthening community awareness and involvement, the Strategy outlines what we will do to reduce costs, causes and effects of litter and enviro-crime. It also recognises and responds to the short, medium, and long-term impacts of Covid-19. In the Strategy there is a focus on four priorities identified via residents' surveys:

- Fighting illegal rubbish dumping.
- Keeping our streets free from litter and detritus.
- Tackling the blight of graffiti and fly posting.
- Ensuring waste is sufficiently contained in bins.

In delivering the Strategy, there will be a focus on six areas:

- Prevention is better than cure.
- Clear public communication and information, using effective channels.
- Empower and support active community.
- Use what we have to best effect.
- A fair yet firm approach to enforcement.
- Be proactive – tackle problems early; don't let them repeat.

The Strategy sets out a series of outcomes and deliverables under each priority over next four years. It does not change policy or state new policy but suggests where new policy or service review is needed and seeks to initiate that process. This EqIA sets out our overall preliminary equality assessment for the strategy. Where new policies or service reviews require further assessments, we will carry these out to ensure that our analysis and actions continue to be equality-driven.

The stakeholders affected by this strategy include: all residents, community groups and property owners, visitors and retail consumers, Council Members, Haringey businesses, incumbent street cleansing contractor (Veolia), internal service managers (Enforcement, Parks Hygiene, Highways, Regeneration, Public Health). We anticipate that there will be positive impacts in particular for residents living on estates and flats-above-shops. There will also be positive impacts for any resident living in, or business trading within, areas most blighted by fly tipping, graffiti and fly posting.

Given the overall focus of the strategy will be on making the physical environment in Haringey cleaner, including in the most deprived area of the borough amongst which there are a disproportionate number of residents with protected characteristics, we anticipate that there will be an overall positive equalities impact. It is anticipated that delivering a cleaner, greener and safer environment will help to support a wide range of

objectives: health and happiness, transport, education, employment and economy. This will positively impact all residents including those with protected characteristics.

The Report and accompanying Strategy will go through Corporate Board and CAB before seeking approval at Cabinet on 9 March.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Annual residents' satisfaction survey 2020 + Residents survey 2018 + Haringey JSNA, Adult mental health, April 2019. Covid-19 Community Impact Assessment.	N/A
Gender Reassignment	Annual residents' satisfaction survey 2020 + Residents survey 2018. Covid-19 Community Impact Assessment.	N/A
Age	Annual residents' satisfaction survey 2020 + Residents survey 2018 + State of Borough report. Covid-19 Community Impact Assessment.	N/A
Disability	Annual residents' satisfaction survey 2020 + Residents survey 2018 + State of Borough report. Covid-19 Community Impact Assessment.	N/A
Race & Ethnicity	Annual residents' satisfaction survey 2020 + Residents survey 2018 + State of Borough report. Covid-19 Community Impact Assessment.	N/A
Sexual Orientation	Annual residents' satisfaction survey 2020 + Residents survey 2018. Covid-19 Community Impact Assessment.	N/A

Religion or Belief (or No Belief)	Annual residents' satisfaction survey 2020 + Residents survey 2018 + State of Borough report. Covid-19 Community Impact Assessment.	N/A
Pregnancy & Maternity	Annual residents' satisfaction survey 2020 + Residents survey 2018. Covid-19 Community Impact Assessment.	N/A
Marriage and Civil Partnership	Annual residents' satisfaction survey 2020 + Residents survey 2018. Covid-19 Community Impact Assessment.	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Sex

- We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

Gender Reassignment

- There is very little robust data on Haringey or the UK's trans population. However, it is estimated that there are between 200,000 and 500,000 people who identify as trans in the UK. According to the LGBT Survey 2018, younger trans people are more likely to identify as non-binary, with 57% of all trans respondents aged under 35 identifying as non-binary. The age at which transitioning is started tends to be younger, with 81% of people starting to transition at 34 or younger, compared to 19% transitioning at 35 and over. Of those who identify as trans in the UK the largest group are of White ethnicity, representing 90% of this group.
- There is no reason to believe that there are specific impacts for this protected group and we will try to ensure that discrimination, harassment, and victimisation is tackled based on this and any other protected group when the Council interacts with this group through engagement activities and home visits.

Age

- Haringey has a relatively large child population with 20% of the population being under 16 years old. Over two thirds of the Haringey population are of working age

(70.1%). We currently undertake 480 assisted collections for elderly and disabled residents.

- The Strategy makes no specific changes to services that could impact elderly people directly. However, the actions that will follow will need to assess the impact of any changes that do happen. This includes reviews related to access to our waste collection services.
- This group is also disproportionately likely to be digitally excluded and we will seek to address this in our approach to communicating our initiatives.
- One goal of the strategy is to keep the streets free from litter and fly tipping. It is anticipated that this will benefit in particular those with restricted mobility, which may include elderly residents.

Disability

- Over 19,500 people aged 16 to 64 in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64.
- In Haringey 4,500 people have a serious physical disability; 15,700 adults have a moderate or severe hearing impairment; and almost 5,000 people have sight loss which impacts on daily life.
- An estimated 5,700 Haringey residents aged 14 and over are estimated to have a learning disability, and around 2,100 residents are estimated to have autism
- We currently undertake 480 assisted collections for elderly and disabled residents..
- The Strategy makes no specific changes to services that could impact disabled people directly. However, the actions that will follow will need to assess the impact of any changes that do happen. This includes reviews related to access to our waste collection services.
- This group is also disproportionately likely to be digitally excluded and we will seek to address this in our approach to communicating our initiatives.
- One goal of the strategy is to keep the streets free from litter and fly tipping. It is anticipated that this will benefit in particular those with restricted mobility, which may include those residents with disabilities (for instance who are partially sighted or restricted in movement).

Race & Ethnicity

- Haringey is a diverse borough. People of White and White Other ethnicity make up the largest proportion of Haringey's population, followed by those of Black, Mixed/other and Asian ethnicity. There is large variation across boroughs.
- We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate impact on this protected characteristic.

Sexual Orientation

- 3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. Within this group just over half identify as Gay or Lesbian, just over one in four identify as Bisexual, and around one in seven identify as 'Other'.

- We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate impact on this protected characteristic.

Religion or belief (or no belief)

- Two out of three residents in Haringey are practicing a religion with Christians (45%) and Muslims (14%) being the largest resident groups.
- We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

Pregnancy or maternity

- We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

Marriage and Civil Partnership

- We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

Residents on low incomes and other intersections

- We also know that the challenges addressed by this strategy are more likely to impact groups in certain types of tenancies and in areas where there is more enviro-crime, graffiti, detritus or litter.
- We know that for residents living in flats-above-shops and estates satisfaction with recycling and general waste collections is between 10 to 17 percentage points lower than for those living in low rise housing. We will seek to combat this in this strategy through our overall efforts to make Haringey cleaner.
- The strategy includes expansion of a pilot scheme on West Green Road to contain bagged waste and recycling which aims to improve residents' satisfaction and improve the look and feel of the neighbourhood.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Annual residents' satisfaction survey 2020:

- Structured (CATI) telephone interviews, average 15 minutes each. 1100 respondents
- Quotas were set on age to ensure representation of both younger and older residents

- Respondents needed to be over the age of 16 and a resident of Haringey

Residents Survey 2018

- Sampling points were randomly selected to cover all wards and levels of deprivation across the borough
- 1,901 responses. A target of 100 interviews was set per ward, with 10 sampling points selected per ward
- A target of approximately 10 interviews was to be achieved per sampling point.
- Targets were set by age and gender within ward and monitored by ethnicity
- Data was weighted, by age and gender at ward level and then by ward to ensure the final data set is representative

The above consultations have given us a basis for arriving at our four priorities. The actions deriving from these may need to delve deeper into specific facets of our services to ensure no unforeseen disadvantages are experienced by protected characteristics. These are discussed in the following sections.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Our consultation findings have informed the analysis which we have set out above and below.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

In addition, the Strategy is strong in building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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2. Gender reassignment

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate impact on this protected characteristic.

However, the Strategy is strong in building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	X
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3. Age

The Strategy makes no specific changes to services that could impact elderly people. However, the actions that will follow will need to assess the impact of any changes that do happen. This includes reviews related to access to our waste collection services. This group is also disproportionately likely to be digitally excluded and we will seek to address this in our approach to communicating our initiatives.

However, the Strategy is strong in building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability

The Strategy makes no specific changes to services that could impact disabled people. However, the actions that will follow will need to assess the impact of any changes that do happen. This includes reviews related to access to our waste collection services. This group is also disproportionately likely to be digitally excluded and we will seek to address this in our approach to communicating our initiatives.

In addition, the Strategy is focused on building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	X
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5. Race and ethnicity

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

However, the Strategy is focused on building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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6. Sexual orientation

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

However, the Strategy is focused on building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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7. Religion or belief (or no belief)

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

However, the Strategy is strong in building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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8. Pregnancy and maternity

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

However, the Strategy is focused on building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership

We have no specific evidence or data to suggest that the priorities and actions described in the Strategy will have a disproportionate or negative impact on this protected characteristic.

However, the Strategy is focused on building community, civic pride and providing clear information to help meet its priorities and therefore has potential to positively impact all protected characteristics.

Positive	X	Negative		Neutral impact		Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
This includes:
 - a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
 - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
 - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The overall focus of the strategy will be on making the physical environment in Haringey cleaner. We therefore anticipate that there will be an overall positive equalities impact – both directly and indirectly.

Our analysis has identified the following areas where the equality implications are likely to be most prominent. As we review services, policy, and public information, we will ensure that where appropriate further equality assessments will be carried out.

APPROACH TO COMMUNITY ENGAGEMENT

- This Strategy seeks to drive forward our engagement with the community. We know 23% of residents would like more influence on the cleanliness of their local area and the Strategy calls for this to be embraced and built upon through equality-led community engagement.

- As we review our approach to communications, we will seek to ensure that the media mechanisms and language we use to deliver information do not disadvantage any particular group with protected characteristics. In particular, the Strategy promotes an increased use of the Our Haringey app for reporting waste, graffiti and fly posting issues. We are aware that residents require a smart phone or computer to do this and we therefore do not suggest that all other existing customer contact channels that do not require a smart phone or computer should be dispensed with. We appreciate that digital exclusion particularly affects residents with protected characteristics, including age and disability, and we will therefore build this into our ongoing analysis. We will also seek to ensure that we address language barriers wherever we can.
- Where necessary for certain policies or issues, such as our street art policy, we will carry out further consultation.

IMPACT ON ACCESS TO WASTE COLLECTION

- We know that there can be challenges for some residents with protected characteristics accessing waste disposal services, particularly those with disabilities or who are elderly. We will therefore focus on ensuring our policies consider these challenges in the following areas:
 1. As we review the bulky waste service we will revise the most recent EqIA to ensure the tariff is fair, assess the current user profile, and determine whether the service is accessed proportionately to all protected characteristics, particularly those with disabilities, within its operational constraints. Currently, those living on estates, where residents generally have lower incomes and amongst whom there are a disproportionate number with protected characteristics, receive free bulky collections.
 2. Before we expand the drop box scheme, we will complete a full risk assessment to determine its merits, particularly with regards to disability and elderly residents.
 3. Our litter bin strategy will also include an appraisal of any access problems arising from the existing provision, particularly for disabled and elderly residents.

IMPACT ON MOBILITY AND THE PHYSICAL ENVIRONMENT

- One goal of the strategy is to keep the streets free from litter and fly tipping. It is anticipated that this will benefit in particular those with restricted mobility, which may include those residents with disabilities (for instance who are partially sighted or restricted in movement) or elderly residents.
- In addition, by keeping streets clean, we anticipate that this will facilitate physical activity by all groups, including those with protected characteristics. Access to physical activity is more challenging for some groups and we anticipate that this will therefore have a positive impact.

IMPACT ON COMMUNITY SAFETY

- Our approach to 'fair but firm enforcement' will be applied within the direction of the Community Safety Strategy and Young People at Risk Strategy
- The Strategy seeks to help reduce the fear of crime for all residents and protected characteristics by maintaining an attractive borough: reducing the levels of litter,

graffiti, fly posting and low-level enviro-crime in the borough, particularly within known hotspots.

- Haringey JSNA, Adult mental health, April 2019, found that in Haringey, people living in deprived areas are more likely to be affected by depression and 61% of people aged 18 and over diagnosed with depression and/or anxiety were women in 2013. One of the measures it cites for reducing inequalities is to strengthening communities: increasing social support, inclusion and participation. This is supported by the Cleaner Haringey Strategy whilst helping to tackle the perception of areas within the borough being deprived.

GEOGRAPHICAL VARIATION

- Where there is geographical variation within the borough in the standard of service, we will seek to address this, as set out in Priority 2 of our action plan: 'overcome unequal standards and cleansing responsibilities across ward and land demarcations.'

OVERALL IMPACT OF COST SAVINGS

- The cost savings associated with street cleansing will result from the testing of new ways of working. These new ways of working do not seek to deteriorate the overall standard of cleansing set for the borough or change services to the disbenefit of any protected characteristic. At this stage, there is no evidence to suggest cost-saving within this area of our operations will disproportionately impact any protected characteristic. It is anticipated that any cost savings and efficiencies attributed to Strategy actions will be invisible to service users.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Yes
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	No
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	No

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty


Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
All areas	Further equality assessments will be carried out as required as new policies and workstreams are implemented.	Waste Collections Team	Ongoing

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

We will put in place monitoring mechanisms in individual policy areas as per standard practice. In addition, to monitor the impact of the overall strategy we will make two changes:

1. The two resident consultations used to derive the needs of the Cleaner Haringey Strategy both met the minimum number of responses to be universally regarded as representative. Each were conducted within set quotas: for satisfaction survey it was by age, and for the Resident Survey, by ward, age, sex and monitored by ethnicity. However, in both cases residents under the age of 16 have not been represented. The Strategy recognises this group as being pivotal in helping secure a cleaner Haringey into the future. Community engagement must be inclusive of residents <16 years of age wherever appropriate. We will seek to include specific research in our communications review into how we are best achieving positive engagement with Haringey residents <16 years old.
2. For future satisfaction surveys, we will also consider how we can take a more targeted response so that proportional representation from protective characteristics other than age can be better understood. Currently, the annual satisfaction survey monitors respondents by sex, sexual orientation, health/disability, property type and tenure and ethnicity but its quotas are set by age and ward of residency only.

7. Authorisation	
EqlA approved by ...  (Assistant Director/ Director)	Date 15/02/2021

8. Publication
<i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>

Please contact the Policy & Strategy Team for any feedback on the EqlA process.