

# **Camden Council Equality Impact Assessment Form**

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Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard<sup>1</sup> to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk) where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

<sup>1</sup> [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying ‘due regard’ means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

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Title of the activity	
Environment Services Contract Renewal	
Officer accountable for the EqlA (e.g. director or project sponsor)	
Full name:	Rachel Bailey
Position:	Head of Environment Services
Directorate:	Supporting Communities
Email:	rachel.bailey@camden.gov.uk
Lead person completing the EqlA (author)	
Full name:	Clive West
Position:	Senior Environmental Services Officer
Directorate:	Supporting Communities
Email:	clive.i.west@camden.gov.uk
Person reviewing the EqlA (reviewer)	
Full name:	
Position:	
Directorate:	
Email:	
Version number and date of update	
v0.1	

## Step 1: Clarifying aims

1.a Is it a new activity or one that is under review or being changed?

- New  
 Under review  
 Being changed

1.b. Which groups are affected by this activity?

- Staff  
 Residents  
 Contractors

Other (please detail):

1.c Which Directorate does the activity fall under:

- Supporting People  
 Supporting Communities  
 Corporate Services  
 More than one Directorate. Please specify:

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## 1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

We Make Camden has an ambition that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency. Camden's Environment Services contract can support the delivery of these ambitions when the current contract with Veolia ES (UK) comes to the end of its initial period. It aligns with the Council's Climate Action Plan and responds to resident feedback by investing in street cleaning to create a clean sparkling environment that is free of litter and waste, invests in electric vehicles to reduce emissions and improve air quality, whilst taking tough action against those caught littering and fly tipping.

It supports our ambitions to make it easy for our residents to minimise waste, maximise recycling and move towards a 'circular economy' by using resources in a more efficient way.

Camden's current Environmental Services contract with Veolia ES (UK) started on 1 April 2017 for an initial period of 8 years with the option to extend for up to a further 8 years. The contract is due for renewal in March 2025 and options have been reviewed and recommendation is being put forward to extend the existing contract by 8 years.

Current services in the contract include waste and recycling collections, street cleansing, the removal of fly tips, winter maintenance, business waste and customer services including call centre and communications. All residents have access to the services provided by Veolia for households with every household sent a printed leaflet each year to promote services, which includes images and Plain English. Services are also promoted on the website, social media and newsletters.

The contract uses an 'outcome-based' specification where Veolia are required to meet certain standards (e.g. cleanliness of streets). They are free to determine the resources and methods of delivery needed to achieve these outcomes, which are:

1. Driving extra surplus from business recycling and waste services
2. Maximum recycling — minimising waste and driving up reuse and recycling
3. Managing Camden's local environmental quality to an agreed standard
4. Increased local employment opportunities and local economic development

Three options for the contract renewal have been reviewed:

- To extend the contract with Veolia for up to a further 8 years (March 2033)
- To procure a new contract
- To bring the service in-house

Assessment of the options has concluded the preferred option is to renew the existing contract with Veolia, as the contract overall has performed well with Veolia having extensive knowledge of the contract and their resilience through covid, and HGV driver shortage evidencing how they can work with the council to manage risks. Benchmarking shows that the contract is either inline or exceeding comparable contracts across London.

Continue on next page if more space is needed.

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A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for the user to provide their response to the Equality Impact Assessment form.

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## Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

### 2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers<sup>2</sup>
- Gender reassignment<sup>3</sup>
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

#### Age

Residents may be eligible for 2 free bulky waste collections each year, if they are aged over 65 and/or receive 100% Council Tax Support.

Camden provides the Veolia call centre with data on residents in receipt of 100% council tax reduction every quarter so they can check against this list to enable discount to be applied.

<sup>2</sup> This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

<sup>3</sup> This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

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## **Disability, including family carers**

Veolia assist residents with putting their recycling and rubbish containers out for collection if they:

- live in a house/ house divided into flats/ have recycling and rubbish collected from street level, and:
- have a disability
- are pregnant or have recently given birth
- have an illness or health condition
- live alone and need support to put your recycling and rubbish out

To request this service, residents contact Veolia via email or phone and assisted collection is noted against the property address. If there are additional needs the resident would like Veolia to note, this is taken at the point of registering for the service. Every 2-3 years Camden writes to those properties on the list to check if there is still a person living at that address who wishes to remain on the assisted collection list. Residents have the option to respond via post (with a return paid envelope), by email or by phone. If there is no response after 3 letters, Veolia will try contacting via telephone if a number has been supplied. If no contact has been possible, the property is removed from the list, however residents can request to go back on the assisted collection list at any time.

## **Gender reassignment**

## **Marriage and civil partnership**

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## **Pregnancy and maternity**

See assisted collection under 'disability'



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**Race**

**Religion or belief**

**Sex**

**Sexual orientation**

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## Intersectional Groups

### 2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

## Foster carers

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## Looked after children/care leavers

## Low-income households

Low income households are offered discounted paid-for services such as bulky and garden waste collections. To enable discounts to be applied, Camden provides Veolia with 100% Council Reduction recipient data, which is checked when residents contact Veolia to request a discounted service.

## Refugees and asylum seekers

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**Parents (of any gender, with children aged under 18)**

**People who are homeless**

**Private rental tenants in deprived areas**

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**Single parent households**

**Social housing tenants**

**Any other, please specify**

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**2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.**

No

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## Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote “good relations” – a better understanding or relationship between people who share a protected characteristic and others?

### 3.a Potential negative impact on protected characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age		
Disability including carers		
Gender reassignment		
Marriage/civil partnership		

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity		
Race		
Religion or belief		
Sex		
Sexual orientation		



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## 3.b Potential positive impact on protected characteristics

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	Older residents who have difficulty presenting their waste containers for collection will have continued assistance to do so.
Disability including carers		As above
Gender reassignment		
Marriage/civil partnership		

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Pregnancy/ maternity		As above (age)
Race		
Religion or belief		
Sex		

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Sexual orientation		

### 3.c Potential negative impact on other characteristics

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers		
Looked after children/care leavers		

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Low-income households		
Refugees and asylum seekers		
Parents (of any gender, with children aged under 18)		

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless		
Private rental tenants in deprived areas		
Single parent households		

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Social housing tenants		
Any other, please specify		

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## 3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers		
Looked after children/care leavers		
Low-income households		

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Refugees and asylum seekers		
Parents (of any gender, with children aged under 18)		
People who are homeless		



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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Private rental tenants in deprived areas		
Single parent households		
Social housing tenants		
Any other, please specify		

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**3.e Consider intersectionality.**<sup>4</sup> Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

<sup>4</sup> Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

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## Step 4: Engagement - co-production, involvement or consultation with those affected

### 4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

<p>List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?<sup>5</sup></p>	<p>If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?</p>
<p>All residents:                      - 2023 survey on experience of Camden's waste, recycling and street cleansing                      - Resident workshop                      - Resident diary and in-depth interviews</p>	<p>A resident survey was carried out in Summer 2023 designed to align with the Good Life Camden framework to gain insight into residents' experiences of Camden's waste, recycling and street cleansing services. The survey was provided online, paper and easy read. Over 800 responses were received. A resident workshop was also held covering the same themes, with 15 participants recruited through the Citizens Panel and chosen to reflect the diverse demographic of Camden's residents. 3 residents from the Panel were also selected to keep a 2-week diary and take part in an in-depth interview to gain deeper insight into their experience of Camden's Environment Services.</p> <p>Overall, participants felt happy with where they live but raised that litter was a key issue and street cleanliness was a concern. The results of the engagement exercises have fed into the current Contract renewal work and shared with the contractor to help develop a future service.</p>

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5 This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

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<b>List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?<sup>5</sup></b>	<b>If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?</b>

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<b>List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?<sup>5</sup></b>	<b>If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?</b>

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**4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.**

Along with the resident survey in Summer 2023, internal cross-directorate teams were also engaged with for insight into current contract performance. This included Estates Management, Green Spaces and the Borough Monitoring teams.

What officers felt worked well was resolving issues such as fly-tips, using the Love Clean Streets app, estates collections and resolving issues.

Areas highlighted as could be better was the need for more collection crews, investment in new vehicles so less breakdowns, more cleansing of estate bins and better co-ordinated cleansing in parks. Officers felt focus on a greener fleet, innovation, provision for flats above shops and supporting transition to a more circular economy should be included in the future service.

As with resident engagement, the results of the internal engagement has fed into the contract renewal options evaluation and recommendation.

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## Step 5: Informed decision-making

### 5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

<p><b>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</b></p>	
<p><b>2. Continue the work as it is because no potential negative impacts have been found</b></p>	<p>Yes, continue as planned, no negative impacts.</p>



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<p><b>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</b></p>	
<p><b>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</b></p>	

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## Step 6: Action planning

**6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.**

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

Action	Due	Owner
Ensure contacting Veolia can be done via several channels to ensure it is as easy as possible depending on various needs — via website, email, telephone and Love Clean Streets app.	Ongoing	Environment Services
Older, pregnant or disabled people may experience difficulties putting out waste containers on-street for collection. Veolia’s provision of the assisted collection service should be	Ongoing	Environment Services

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Action	Due	Owner

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## Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk)

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## Step 8: Sign-off

<b>EqIA author</b>	Name Clive West Job title Senior Environmental Services Officer Date 20.12.23
<b>EqIA advisor / reviewer</b>	Name Clara Barnes Job title Equality Impact Assessment LEad Date 10.01.24
<b>Senior accountable officer</b>	Name Frances Evans Job title Environment Services Manager Date 10.01.24