

## **Equality Impact Assessment / Equality Analysis** (Version 4)

<b>Item name</b>	<b>Details</b>
<b>Title of service or policy</b>	Business Waste Review – City Centre Bath
<b>Name of directorate and service</b>	Waste Services
<b>Name and role of officers completing the EqIA</b>	Mathew Eggleston, Sammy Moody
<b>Date of assessment</b>	14/11/2024; updated 08/05/2025

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

### 1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>The primary objective of this project is to review and adjust the collection time window for business waste in the city centre to ensure that no business waste is visible between the times of 10am and 6pm.</p> <p>The implementation of this project is being led by the waste team and cleansing enforcement, with support from the Council's business engagement team. Bath BID is being closely consulted and involved to ensure engagement with its levy payers.</p> <p>This initiative aims to enhance the aesthetic appeal and cleanliness of the heritage area, improving the experience for residents, businesses, and visitors during shop opening hours and the critical early evening period.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p>	<p>Review to an existing policy and not a national requirement.</p>

<ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	<p>The review of this policy is at the request of Cabinet in a drive to improve the public realm within central Bath. The existing collection times have been in place for a number of years, during which time trading hours, city centre security measures and visitor numbers have significantly changed.</p> <p>The review of this policy also follows changes Bristol and other comparable cities such as Oxford have made to address issues associated with business waste being left on the street for extended periods of time.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The proposed changes will benefit the council's highways services by reducing the timeframe that business waste is on the street preventing prolonged obstruction to public highways. It will also support the highways network by seeking to reduce the current problems with collection vehicles queuing at security barriers before they are lowered at 6pm in some parts of the city.</p> <p>A change of policy could also assist in improving the council's current Clean Air Zone policies by reducing times collection vehicles are within the city centre, leading to improved air quality which in turn supports the council's Climate Emergency and commitment within the Liberal Democrat's manifesto of cleaner and safer streets.</p>

## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equality focussed training have staff received to</p>	<p>All council staff are required to complete corporate training as part of their induction and to review on an annual basis.</p>

enable them to understand the needs of our diverse community?	
<b>2.2</b> What is the equality profile of service users?	<b>Business Diversity:</b> Different types of businesses (e.g., retail, hospitality, offices) may have varying needs and constraints, however the proposed time changes would still provide businesses with suitable times for presenting business waste.
<b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Businesses were asked via the formal consultation for this proposed change if they were satisfied with the current collection window. 91% of respondents said they were happy with the current times. Conversely, the Council encourages feedback on cleansing issues and containers being left out beyond collections times through our FixMyStreet reporting channels. In 24/25, 21 reports were taken about business waste being incorrectly placed and / or left out.
<b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>Engagement with the Council's Cabinet, City Centre Management Group, and Bath Business Improvement District (BID), who have prioritised business waste due to current waste issues noted within the city centre. We have consulted with businesses and local waste management contractors, and sought the views of ward councillors and cabinet members.</p> <p>The online consultation with businesses had an 8% response rate. Key results from the business consultation were:</p> <ul style="list-style-type: none"> <li>• 69% support mandatory use of Reuseable Refuse Bags (RRBs),</li> <li>• 76% support mandatory container labelling with business name and address,</li> <li>• 93% oppose the change in collection window from 5-8:45pm to 6-8pm.</li> </ul> <p>Local waste contractors cited higher staffing costs and potential for increased vehicle numbers for servicing all customers within proposed changes. All respondents stated a 3 months' notice period would be required to plan for these changes.</p>
<b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?	<p>The Waste Strategy Team will be mindful of equality considerations when consulting with impacted businesses. The following communication methods will be used where businesses can consult with the council and discuss concerns:</p> <ul style="list-style-type: none"> <li>• Letters and leaflets to all businesses - will include a central contact phone number and email address.</li> </ul>

Commented [SM1]: Update with summary of consultation and results

- Alternative formats will be available by request which can include a large print copy
- Drop-in sessions will take place at Studio 22 on New Bond Street. Location for drop in sessions is located near disabled parking bays and The Podium car park if required.



- Translation/interpretation services on request or where a need of an individual or company is already known.

### 3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	Less waste and recycling left on the highway within the specified timeframe will support all people walking, wheeling and cycling around the city of Bath by	Consultation responses from small/independent businesses indicated that the time change may be more challenging to conform to than larger,

	removing potential obstacles thereby reducing overall risks of slips, trips and falls.	chain stores, as they cannot afford to pay more in wages for staff to stay later to present waste. All businesses have the option to organise morning waste collections. Some waste contractors also offer to collect directly from their premises, avoiding the need to stay later to present waste.
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	No known impact is anticipated	No known impact is anticipated
<b>3.3 Pregnancy and maternity</b>	Parents/carers will have less business waste to navigate when pushing prams/pushchairs.	No known impact is anticipated
<b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	No known impact is anticipated	No known impact is anticipated
<b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)	Disabled people will benefit from clearer clutter free business waste on the highway during the specified core hours.	Positive impact is anticipated
<b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups	Elderly people will benefit from clearer clutter free business waste on the highway during the specified core hours.	No known impact is anticipated
<b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups	No known impact is anticipated	No known impact is anticipated

**Commented [SM2]:** I think we could now add here that small/independent business owners may be negatively financially impacted due to additional staff costs.

<b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	No known impact is anticipated	No known impact is anticipated
<b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	No known impact is anticipated	No known impact is anticipated
<b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	No known impact is anticipated	No known impact is anticipated
<b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b>	Collections would be within reasonable times (earliest being 7am) so should not impact the people experiencing homelessness from noise generated during collection.	Potential adverse impact on SMEs employing low paid staff where working hours may be affected by proposed changes.
<b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities	No known impact is anticipated as this relates to the City of Bath.	No known impact is anticipated. Potential impact on employees living in rural residents with poor availability of evening transport services back home from work.
<b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required	No known impact is anticipated	No known impact is anticipated

<p>by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>		
<p><b>3.14 Care Experienced ***</b>  This working definition is currently under review and therefore subject to change:</p> <p>In B&amp;NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	<p>No known impact is anticipated</p>	<p>No known impact is anticipated</p>

\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

\*\*\*The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

#### 4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Business compliance to changes	Engagement with businesses through letters and leaflets being sent out, followed by drop-in sessions within the city centre.  Sufficient notice period to allow for planning and adjustments with the new policy.	Consultation launched week commencing 10 <sup>th</sup> February to end March 2025.  Notification letters to businesses and waste contractors to be sent in June, providing 3 months' notice and clear advice on how to comply and where to retrieve further information on managing their waste.	SF/LG AS/ME	End March 25  June 2025
Waste left out overnight after collection times or missed by waste contractors and businesses that are closed and unable to return waste to the property.	City centre monitoring by Cleansing Enforcement to identify issues and engaging with businesses.		SF/AS	September 25 onwards
Storage space within businesses	Engagement with businesses through letters and leaflets being sent out, followed by drop-in sessions within the city centre.		SF/LG AS/ME	
Increase cost to businesses to cover changes in shift patterns and	Engagement with businesses through letters and leaflets being	Notifications out promptly to allow for sufficient planning and rota	SF/LG AS/ME	June 25

potential lone working from employees.	sent out, followed by drop-in sessions within the city centre	changes as required meet their own needs.		
Traffic and Congestion	Engagement with the waste contractors and council's business waste collection team. Review practicalities of shorter evening window with private waste collection providers to assess impact on their working hours and safe working. Review implications with Highways & Parking team.	Direct contact with internal teams and key stakeholders	LG/SF AS/ME	September 2025

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** Simon Porter (Divisional Director or nominated senior officer)

**Date:** 15/05/25