

# **EQUALITY IMPACT ASSESSMENT**

# **EASTERN REGION WASTE MANAGEMENT PLAN**

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# **Equality Impact Assessment –Eastern Region Waste Management Plan**

# **Executive Summary**

- (a) The eleven councils in the Eastern Region of Northern Ireland are committed to fulfilling their responsibilities under Section 75 of the Northern Ireland Act (1998), the Equality duty. The councils in response to this requirement have developed Equality Schemes that have been approved by the Equality Commission. This establishes the approach the councils will take in assessing the equality impact of their policies and procedures.
- (b) The aim of the Eastern Region Waste Management Plan is to "ensure facilities are provided that meet the needs of the people in the councils in the Eastern Region and that European and UK targets for waste reduction, recycling and recovery are achieved".
- (c) This Equality Impact Assessment (EQIA) relates to the measures in the Waste Management Plan that will be implemented to recycle household waste e.g. the introduction of additional containers\* to suitable house types and the provision of recycling centres and civic amenity sites for recyclable materials. A suitable house type is defined in the Plan as "those households that can accommodate additional containers". Flats and a high proportion of terraced houses will not therefore be provided with additional bins although the provision of additional containers to flats and terraced houses is not ruled out in the Plan.
- (d) As part of the implementation of the Waste Management Plan each of the eleven councils will decide which house types will have access to additional containers.

<sup>\*</sup> The additional containers may include bins, boxes or bags.

- (e) An assessment of the impact of the Eastern Region Waste Management Plan has been made in respect of the nine categories of persons identified under Section 75 and a number of issues have been identified through the consultation process e.g with regard to elderly persons, persons with a disability and those with dependants. The issues identified are as follows;
  - problems created by the additional bins on the kerbside;
  - access to collection service where people do not live in a suitable house type
  - access to information on the assisted lift scheme and the application of the eligibility criteria;
  - access to education and information on recycling in different formats;
  - the ease of access to the recycling centres and civic amenity sites.
- (f) Based on the analysis of the data it is apparent that there is a correlation between house type and some of the nine categories of persons identified under Section 75 e.g. religion, age, gender, marital status and dependants. It is not however possible at this stage to be specific in assessing impacts across the categories of persons identified under Section 75 as councils have yet to decide which house types will receive the additional containers. The potential for differential adverse impact is considered in light of the information and research available. Opportunities exist for each council to further promote equality of opportunity when making decisions on suitable households that will be provided with additional containers and these are highlighted in the recommendations.

- (g) The arc 21 Steering Group has given careful consideration to the measures that might be taken to eliminate, or at least mitigate the adverse impacts identified through the EQIA process and these are presented below.
  - That each council defines suitable house type eligible for the 2
    or 3 bin kerbside collection service as widely as possible and
    explores alternative mechanisms where the public are interested
    in recycling but do not live in a suitable housetypes for the 2/3
    bin collection service:
  - That the operation of the waste collection service is designed where possible to maximise the number of suitable households that can avail of additional containers;
  - That the number of bring banks are maximised where possible in areas not suitable for kerbside collection;
  - That once decisions are taken by councils on the suitable house types to which the additional containers will be provided a more detailed analysis be undertaken of households and community background;
  - That further research is undertaken into the local specific needs in terms of making information on recycling available and the measures that may be required to make information more accessible to those people who are not fluent in English;
  - That councils review the promotion of their assisted lift scheme and the eligibility criteria that they apply;
  - That those councils who charge for the bulky refuse service may need to review how they apply charges and concessions;

- That councils give consideration to local initiatives which may contribute effectively in alleviating some of the potential adverse differential impacts identified in this report based on their merits;
- That councils provide training for operatives on returning bins to the curtilege of the property or the point of collection when emptied;
- That councils may need to review the opening hours of civic amenity sites;
- That options are considered to make bring sites and civic amenity sites more user friendly for people with a disability and the elderly;
- That councils provide information in alternative formats in accordance with the provisions in their Equality Schemes;
- That options are considered to produce more accessible information on recycling for those with a learning disability;
- That options are considered by councils in terms of design issues to facilitate visually impaired people to distinguish between bins;
- That the group involved in the consultation through Disability
  Action is used as the nucleus of an ad hoc group by arc 21 for
  ongoing consultation on relevant issues identified in this report
  as considered appropriate by this group.

 That councils implement monitoring systems in relation to those areas where the potential for adverse differential impact has been identified and keep under review the mitigating actions it may be necessary to implement.

# arc 21 Equality Impact Assessment on: the Eastern Region Waste Management Plan

#### 1.0 Introduction

- 1.1 Under Section 75 of the Northern Ireland Act (1998), each council in the Eastern Region is required to produce an Equality Scheme. An Equality Scheme is a work-Plan showing how each council will main-stream equality of opportunity into it's work. Councils have also given an undertaking to carry out Equality Impact Assessments (EQIA's). An EQIA is an in-depth study of policy or decisions to see how it affects the nine groups of persons covered by Section 75.
- 1.2 The eleven councils in the Eastern Region (the arc21 partnership) have undertaken an EQIA on the application of policies on kerbside collection of household waste and recyclables across the region.
- 1.3 This EQIA has been published as part of the Final stage of the EQIA relating to the Eastern Region Waste Management Plan.
- 1.4 Further copies of the EQIA report are available on the website at http://www.arc21.org.uk

If you have any queries about this document, and its availability in alternative formats (including Braille, disk and audio cassette and in minority languages to meet the needs of those who are not fluent in English) then please contact:

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# **Section 75 the Statutory Duties**

- 1.5 Guidance issued by the Equality Commission for Northern Ireland (Practical Guidance on Equality Impact Assessment) states that public authorities shall have due regard to the need to promote equality of opportunity:
  - Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
  - Between men and women generally;
  - Between persons with a disability and persons without;
  - Between persons with dependants and persons without

Without prejudice to its obligations above, the public authority must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

# **Equality Impact Assessment**

- 1.6 The Equality Impact Assessment (EQIA) is being carried out in accordance with the Procedure for Conduct of Equality Impact Assessment outlined in the Guide to the Statutory Duties. The seven separate elements of the EQIA are:
  - 1. Consideration of available data and research
  - 2. Assessment of Impacts
  - Consideration of measures that might mitigate any adverse impacts and alternative policies that might better achieve the promotion of equality of opportunity
  - 4. Formal consultation
  - 5. Decision by the Public Authority
  - Publication of results of the EQIA
  - 7. Monitor for Adverse Impact.

This is the final EQIA report and covers elements, 1 - 6 of the Equality Impact Assessment.

# **Consideration of Available Research and Data**

1.7 Considerable effort has gone into collecting a wide range of reliable statistical and qualitative data however, decisions have yet to be taken on the definition of suitable house types for the 2/3 bin collection service in each council area and in some cases up to date data is not as yet available. An extensive Consultation exercise was undertaken during earlier stages of the development of the Plan and this is detailed in the main report. Although this consultation exercise was not targeted specifically at equality aspects, we have drawn on this where appropriate.

Supplementary tables have been included in the Appendices following the publication of the 2001 Census. The report has not however been revised in accordance with any changes in the statistical data as this was made available following the drafting of the initial report. However no feedback has been received during the consultation process in respect of this new data.

# 2.0 Background

- 2.1 The Eastern Region Waste Management Group (ERWMG) is comprised of the following eleven Councils from the eastern part of Northern Ireland: Antrim Borough Council, Ards Borough Council, Ballymena Borough Council, Belfast City Council, Carrickfergus Borough Council, Castlereagh Borough Council, Down District Council, Larne Borough Council, Lisburn City Council, Newtownabbey Borough Council, and North Down Borough Council.
- 2.2 These Councils have formed a partnership called arc 21 to produce a Plan on how they propose to deal with waste over the next twenty years. The Plan also identifies the immediate needs and changes that need to be made to Waste Management practices to 2005.
- 2.3 The strategic framework for the Plan is provided in the Northern Ireland Waste Management Strategy (2000) and the Department for the Environment (DOE) Draft Regional Strategic Framework "Shaping Our Future" (1998). The latter document contains Strategic Planning Guidelines (SPGS) including SPG 28.3 regarding the promotion of a Waste Management Strategy for Northern Ireland. This document also provides guidelines for supporting economic development, developing transport and infrastructure, rejuvenating urban areas, strengthening social cohesion and for the protection and enhancement of the physical, natural and man-made environment.
- 2.4 The arc 21 councils were assisted by an environmental consultancy (Enviros) to produce the Waste Management Plan for the Eastern Region. The Plan was developed through an extensive consultation process and provides an analysis of the type and level of waste in the Eastern Region and of the best ways of achieving waste prevention, reduction, recycling, recovery and disposal.

Data from the public consultation exercise carried out by McCann-Erickson on behalf of the E.H.S. (Environment and Heritage Service) during the "Wake Up to Waste" Initiative was also used to provide additional information for the EQIA.

- 2.5 Within the Plan a preferred option is identified based on the following measures:
  - (a) the phased introduction of a 2 or 3 container system for the collection of organics (garden materials and vegetable peelings), and/or dry recyclables (paper and packaging) and residual waste to suitable house types in the Eastern Region;
  - (b) dry recycling materials such as paper to be sorted at a materials recovery facility and organics through composting introduced before 2005;
  - (c) composting of green waste collected at civic amenity sites by 2005;
  - (d) use of thermal treatment to reduce the remaining waste to the level necessary to achieve the European and UK landfill targets;
  - continuing the disposal of all remaining waste in existing or newly designated landfill sites.
- 2.6 This EQIA relates to the measures to be implemented under bullet points (a) (b) (c) for household waste. Decisions have not as yet been taken on the other measures in the Plan. The arc 21 partnership has however taken cognisance of the fact that other measures may need to be subject to EQIA at a later stage.

2.7 One of the first measures to be implemented by the eleven councils is as follows:

The early introduction of 2 or 3 bins or containers for kerbside collection to suitable house types, in the Eastern Region. A suitable house type is defined as those house types that can accommodate additional containers. Certain high-density housing may not have the space for more than one bin per household. For the Eastern Region as a whole 65% of households are considered to be suitable for a two bin collection and 50% suitable for a three bin collection system as follows:

2 bin collection All detached, bungalows and 50% of

terrace houses

3 bin collection 90% of detached, semi-detached,

bungalows and 25% of terraced

houses

As part of the implementation of the Plan each council will decide how the definition of suitable house types will be applied and which households will therefore have access to the enhanced kerbside collection service. Councils are however prepared to actively work with those people who do not live in a designated suitable housetype to explore other options which could facilitate them to recycle their waste.

2.8 A range of different approaches to recycling is currently taken across the eleven councils. The implementation of the Waste Management Plan involves introducing collection proposals that will include providing up to three bins or containers to suitable houses. It is proposed that the kerbside collection of household waste and recyclables would operate as current kerbside collections i.e. that containers would be left out to the kerbside and returned to this point by the collection crew after emptying.

- 2.9 Civic amenity sites are provided by all councils for local residents to dispose of bulky waste, garden waste and recyclable materials and these supplement the provisions for waste collection and recycling in the Eastern Region. There are approximately 34 operational sites that are located close to centres of population. The majority of sites have collection facilities for newsprint and magazines, brown, clear and green glass, cans, waste oils, textiles and green waste, in addition to skips for the disposal of mixed household waste.
- 2.10 The bring sites involve the use of freestanding containers placed at specific locations where the public can deposit a variety of clean, segregated materials such as glass and aluminium cans. These vary in size from small facilities in car parks concentrating on glass and can collection to larger facilities on dedicated sites collecting a wider range of material. There are currently around 75 bring sites in the Eastern Region.
- 2.11 Based on available data it is apparent that there is a correlation between house type and some of the Section 75 categories of persons eg. religion, age, gender, marital status and those with dependants. While it is not possible at this stage to be specific in assessing impacts across the Section 75 groups of persons the potential for differential adverse impacts is considered in light of the information and research available. Moreover, there will be opportunities for councils to further promote equality of opportunity when making the determination on suitable house types. As stated previously in Section 2.7 Councils will however take reasonable steps to accommodate those who wish to participate in recycling.

### Pre consultation Process.

2.12 During the course of gathering data for the EQIA letters were issued to 150 representatives of groups associated with each of the nine categories and a series of meetings convened. Those in attendance at the meetings specifically represented persons with a disability and the elderly.

Follow up phone calls were made to over thirty organisations representing the nine Section 75 groups and comments recorded through phone call discussions.

The draft report was also circulated to the eleven councils in the eastern region for comment and tabled at the arc 21 Forum meeting.

A number of the themes introduced for discussion and comment through the initial consultation process have been incorporated in this report.

# 3.0 The Waste Management Plan.

#### The Overall Aim

To ensure facilities are provided that meet the needs of the people in the councils in the Eastern Region and that the European and UK targets for waste reduction, recycling and recovery are achieved.

# The Objectives

To identify an option for managing waste within the Eastern Region that provides the right balance between:

- the provision and maintenance of sufficient disposal capacity to deal with the waste produced;
- the achievement of the European and UK targets for reduction, recycling and recovery;
- the protection of the environment for present and future generations.

#### **The Outcomes**

- to recover 25% of household waste by 2005 of which 15% is to be achieved through recycling and composting
- to recover 40% of household waste by 2010, of which 25% is to be achieved through recycling and composting.
- To reduce the quantity of biodegradable municipal waste municipal waste land filled to:

**85%** of 1995 baseline levels by **2005** 

**75%** of 1995 baseline levels by **2010** 

50% of 1995 baseline levels by 2013

35% of 1995 baseline levels by 2020

# 4.0 Assessment of Impacts

The assessment of impacts considers whether there are differential impacts or potential differential impacts in relation to each of the nine categories of persons identified in Section 75. Where a differential exists we consider if the impact is adverse or has potential to be.

# **Religious Belief**

Nine of the eleven district councils are predominantly Protestant (Down is predominantly Catholic and Belfast is fairly evenly divided) see Appendix 1 *Household and Religion by District Council Area*.

Appendix 2 describes the profile of household type by religion at a Northern Ireland level. This indicates that there are differences in terms of house type and religion for example householders in detached properties are twice as likely to be Protestant as Catholic.

The information available in the Plan indicates that certain house types for example terrace housing is less likely to be able to accommodate the 2/3 bin collection service. This is accentuated in Belfast City which represents 31% of the households in the Eastern Region. It is assumed in the Plan that there will be a lower level of participating households in Belfast owing to the high levels of potentially "unsuitable households" (Appendix 7B Consultation Waste Management Plan) see Appendix 3. Across the Eastern Region there will be a proportionately higher number of Catholics not receiving the full service.

An analysis of the existing bring sites and civic amenity sites shows that councils have already made efforts to locate these in areas that are accessible to the two communities. The placing of future sites will however need to take into account the differential impact arising from the distribution of suitable housing.

At present there are some differences between the services provided in rural and urban areas. The Eastern Region is however predominantly urban and while there is an urban/rural religious differential at a Northern Ireland level this is not significant in this assessment.

# **Political Opinion**

The local election results for 2001 show that political opinion mirrors religious belief at the district level. Consultation to date with political institutions has not indicated any issues pertinent to political opinion.

Initial responses from the Green Party and ICTU have identified a number of issues relevant to the other Section 75 categories and these are considered below.

# **Racial Groups**

Appendix 4 Estimated Populations of Minority Ethnic Communities in Northern Ireland provides a breakdown of ethnic minority communities. Preliminary consultation and research has identified the main issues as:

# a) Those for whom English is a second language

A report by the Multi Cultural Resource Centre for NI indicates that there are people of Chinese and Indian origin in most districts and, in particular, people of African origin in Belfast, Ballymena and Co. Antrim, and of Bangladeshi origin in North Down, Ards and Greater Belfast. People from almost all identified minority ethnic communities are resident in Belfast.

Communication is important in relation to:

- information on the changes which the Plan will bring about
- information on bank holiday arrangements for bin collections, amenity site opening hours etc (often published in newspapers and on labels attached to bins)
- information, directions and notices at bring banks and civic amenity sites
- contact with councils to obtain information, make complaints etc.

An audit of the information currently made available by councils on the opening hours of civic amenity sites, bank holiday refuse collection arrangements and bulky waste collection services demonstrates that information is generally presented in a written format in leaflets, newspaper advertisements and labels attached to bins.

#### (b) Cultural differences

For example in relation to Irish Travellers, there are 2 serviced sites and 2 co-operated sites in Belfast city with the potential for 72 pitches (individual households) however not all are occupied. It has been established that those who live in the sites receive the same refuse collection services as those in other households. Contact was established with the Traveller Movement NI through the informal and formal consultation exercises and they have not raised any issues in relation to the recommendations in the EQIA report.

# Age

There are a number of potential issues in relation to the elderly, mainly arising from their comparative physical infirmity and reduced access to recycling facilities. The consultation undertaken by Enviros when the Plan was being developed and the consultation responses received in relation **to** this EQIA have confirmed these issues.

Appendix 5 Age of Head of Household indicates that there is a significant percentage of elderly householders across the Eastern Region (at least 30% in each council area.) Given the issues identified this will have an impact on the levels of mitigating actions required.

Appendix 6 Age of Head of Household by Dwelling Type shows that across Northern Ireland high proportions of elderly householders live in accommodation which would be regarded as suitable for the application of the 2/3 bin system. Exclusion on the basis of suitable house type is not likely to be statistically significant.

There are issues which are common to the elderly and people in other categories, such as the physically disabled and those with dependants and these are discussed in more depth below.

The initial consultation undertaken by Enviros showed that there are people who are either unaware of assisted lift schemes or do not qualify for assistance. An analysis of the information supplied by councils shows that there are varying eligibility criteria and differences in the level of promotion of the schemes.

There are also issues for the elderly around the obstruction caused by bins sitting at the kerbside for lengthy periods. This issue was confirmed during the informal and formal consultation phases.

In relation to bulky refuse, some councils currently charge for collection from the home and a number operate discounted schemes for elderly persons. This would constitute a differential impact in respect of non elderly people.

Groups representing young people indicated an interest in participating in the formal consultation process. However no response was received following the publication of the draft EQIA or in relation to follow up phone calls. As the failure to engage with young people was raised as a criticism of the consultation process undertaken during the development of the Plan this is an area which should be given consideration when developing the monitoring systems.

#### **Marital Status**

An analysis has been undertaken on the head of households across the 11 districts by marital status (see Appendix 7 *Marital Status of Head of Household*). To date no issues have been identified from research or informal or formal consultation arising from current policies or the Plan, which would impact on people solely because of their marital status.

# **Sexual Orientation**

No data is available on households by sexual orientation and no issues have been identified during the informal or formal consultation arising from current policies or the Plan that would impact on people solely because of their sexual orientation.

#### Gender

An analysis has been undertaken on households across the 11 districts by the gender of the head of household (see Appendix 8 *Gender of* 

Head of Household) which shows that approximately 60% is male. The only information on who is responsible for dealing with refuse in households of mixed gender was identified during the formal consultation meetings where a comment was made that the initiatives would be likely to have a greater impact on women. Moreover, the Census data demonstrates that a higher percentage of elderly people are female (see Appendix 9). Once again this is an area which should be given consideration when developing the monitoring systems.

# **Disability**

# (a) Mobility problems

Across the eleven councils a range of 10.4% to 16.5% of households have a person with a mobility problem (see Appendix 10 Household Member with a Mobility Problem). Additionally across the councils up to 20% have an occupant drawing a disability benefit (see Appendix 11 Claimants of Disability Benefits by Age and District Council, November 2001). The initial consultation suggests that people with mobility problems may have difficulty in segregating waste, managing up to 3 bins and accessing recycling facilities and this will be taken account of in the mitigating measures.

Comments made during the consultation on the Plan suggest that people with mobility problems also may not be aware of the assisted lifts schemes.

Persons with mobility problems may have difficulty in using the facilities currently provided at Bring sites and Civic Amenity Sites (*Bruslee Recycling Plant Newtownabbey Access Audit, Disability Action, April 2002*). This report provides information on potential access problems for persons with varying types of disability.

# (b) Visual impairment

The RNIB estimates that there are about 15,000-16,000 people with visual impairments living in the Eastern Region. There are three main issues for people with visual impairment, namely access to information, which is generally presented in a written form, obstruction of pavements, and access to bring banks and civic amenity sites.

Information provided by Disability Action, RNIB and Guide Dogs for the Blind and the Blind Centre N.I. has indicated that failure to provide information in alternative formats can result in adverse differential impacts. An audit of the information currently made available by councils on the opening hours of civic amenity sites, bank holiday refuse collection arrangements and bulky waste collection services demonstrates that information is generally presented in a written format in leaflets, newspaper advertisements and labels attached to bins.

A number of consultees have raised concerns about the obstruction of footpaths arising from multiple bins being placed on the kerbside at the same time or bins being presented on additional days.

## (c) Learning difficulties

Mencap estimates that 2% of the population (approximately 33,000, people) in Northern Ireland have a learning disability.

Mencap has also commented that failure to provide information in easily understandable formats can result in adverse differential impacts for people with learning difficulties. There are also issues relating to access to recycling facilities, as most people with learning disabilities do not have access to transport.

# (d) Hearing impairment

RNID estimates that up to 200,000 people in Northern Ireland have a hearing problem. No specific differential impacts have been identified for people with hearing difficulties at this stage, other than the fact that they have less access to transport. It should be noted again that failure to provide information in alternative formats can result in adverse differential impacts.

# **Dependants**

Appendix 12 Households with Dependant Children shows that 34% of households in the Eastern Region have dependant children. It is noted that some families will have dependants other than children but no specific data is available.

Some councils currently provide additional waste storage capacity free of charge for larger households (eg families with 4+ children) which suggests that larger families may generate more waste. They may suffer an adverse differential if the capacity of the bins provided under this Plan is less than that of their current bins. Moreover this issue was formally raised during the formal consultation exercise and should be given consideration in implementing future monitoring systems.

Appendix 13 Household Type by Dwelling Location shows that lone parents make up 5.7% of all households across Northern Ireland. Gingerbread has raised issues about access to recycling facilities for lone parents owing to the low levels of car ownership. While the Rural Community Network has identified potential differential impacts resulting from the opening hours of recycling facilities, which vary from council to council.

# 5.0 Consideration of Measures to Mitigate any Adverse Impact

5.1 The eleven councils in arc21 have given careful consideration to the measures identified to mitigate any adverse impact identified in the previous sections of the report. As identified earlier in this report it is not however possible at this stage to be specific in assessing local impacts across the Section 75 groups. The potential for differential adverse impact is considered in light of the information and research available. Moreover, opportunities are identified for councils to further promote equality of opportunity when deciding on: the suitable house types to be provided with 2 or 3 bins and additional containers; how access can be improved to the bring sites and civic amenity sites and how operational arrangements can be made to increase the number of households that will be able to avail of the kerbside recycling facilities.

#### **Recommended Action**

- That each council defines the suitable house types for the 2 or 3 bin kerbside collection service as widely as possible and explores alternative mechanisms where the public are interested in participating in recycling but do not live in a suitable housetype for the 2,3 bin collection service;
- That the operation of the waste collection service is designed where possible to maximise the number of suitable households included in the additional container kerbside collection service;
- That where possible the number of bring banks is maximised in areas not suitable for kerbside collection;
- Once decisions are taken by councils on the households to which the additional containers will be provided a more detailed

analysis be undertaken of households and community background;

- That further research is undertaken into the local specific needs for information on recycling and on the measures that may be required to make information more accessible to those people who are not fluent in English;
- Councils review the promotion of their assisted lift scheme and the eligibility criteria that apply;
- That those councils who charge for the bulky refuse service may need to review how they apply charges and concessions through a separate EQIA;
- That in accordance with the comments raised during consultation that councils provide training for operatives on returning bins to the curtilege of the property or to the point of collection when emptied;
- That councils give consideration to local initiatives which may contribute effectively in alleviating some of the potential adverse differential impacts identified in this report based on their merits;
- That councils may need to review the opening hours of civic amenity sites;
- That options are considered to make bring sites and civic amenity sites more user friendly for people with disabilities and the elderly;
- That options are considered to produce more accessible information on recycling for those with a learning disability;

- That councils provide information in alternative formats in accordance with the provisions in their individual Equality Schemes. This could mean measures from Braille to special website adaptations;
- That options are considered by councils in terms of design issues to facilitate visually impaired people to distinguish between bins.
- That councils implement monitoring systems in relation to those areas where potential for adverse differential impact has been identified and keep under review the mitigating actions it may be necessary to implement.
- That the group involved in the consultation through Disability
  Action is used as the nucleus of an ad hoc group by arc 21 for
  ongoing consultation on the relevant issues identified in this
  report as considered appropriate by this group

### 6.0 Consultation

#### 6.1 Pre consulttion

- Detailed consideration has been given to the equality issues identified through the extensive consultation exercise implemented when the Plan was under development by Enviros;
- During the course of data gathering for the EQIA information on the Plan was circulated to over 150 organisations representing the Section 75 groupings, follow up phone calls were made and

consultation responses received from a range of organisations. (See Appendix 14);

- In response to the letter circulated during pre-consultation written responses were received from the Green Party, ICTU, Northern Ireland Environment Link and Friends of the Earth;
- Pre consultation meetings were also convened with representatives from Mencap, RNIB, Blind Centre N.I., Sense, Guide Dogs for the Blind, Disability Action, Age Concern and Max O'Brien;
- The draft report was circulated to the eleven councils in the eastern region and to the arc 21 Forum for comment.

#### 6.2 Formal Consultation

During the formal consultation phase arc 21 consulted as widely as possible on the preliminary findings of the EQIA and associated mitigating actions. With this objective in mind arc 21 took the following actions:

- A press release was prepared and submitted to the eleven councils in the eastern region for distribution to the various media outlets and newspapers read by the main communities in the Eastern Region;
- A prominent advertisement inviting the public to comment on this matter was placed in the Belfast Telegraph;

- This report was made available to the 815 consultees listed in the 11 Councils' Equality Schemes and to any member of the public on request;
- A copy of the report was posted on the arc21 website;
- Three focus group meetings were organised with representatives of particular local interest groups in Belfast, Ards and Antrim and 138 letters of invitation were forwarded to local community organisations;
- Follow-up phone calls were made to a range of organisations representing the 9 Section 75 groups and a further meeting was facilitated:
- The overall results of the consultation process are provided in the Matrix in Appendix 14

## 7.0 Publication

This report will be available on the arc 21 website at http:\www.arc21.org.uk. it will be available on request in other formats (including Braille, Disk and Audio Cassette and in minority languages to meet the needs of those who are not fluent in English).