



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Recycling frequency collection changes
Lead officer	Paul Stacey
Person completing the EIA	Ruth Young/Laura Allan
Type of policy, function or service:	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
Version & Date	V0.2 22 January 2024

1. Background

Watford Borough Council undertakes Equality Impact Analyses (EIAs) to assess the impact of its decisions and potential changes to service delivery on its communities. The EIAs have particular reference to the council's duties under the Equality Act 2010 as a public sector organisation and the potential impact on those members of our communities with a protected characteristic (or characteristics). Furthermore, the council is committed to advancing equality of opportunity, removing barriers to accessing services and fostering relations that support and enhance the diverse and cohesive communities of Watford and recognises the importance that the challenge and insight of a robust EIAs plays in achieving this.

Waste and recycling contract savings

A report is to be presented at full Council on 30 January 2024 detailing Veolia's savings proposals. This EIA, therefore, considers these proposed changes in the context of the requirements of the Equality Act 2010 for the council to consider the following three areas:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

Overview of the proposals

i. The council's waste and recycling duties

Watford Borough Council is the Waste Collection Authority for the Borough and has a legal duty under the Environmental Protection Act 1990 (as amended) (EPA) to make arrangements for the collection of household waste free of charge. Household waste is defined in section 75 of the EPA as waste from a building used wholly for the purpose of living accommodation.

Any other waste that a householder generates, such as garden waste, the Waste Collection Authority is not legally obliged to collect and, if requested by the householder to collect, can levy a charge for that collection.

ii. Proposals for change

The council is proposing changes to the waste and recycling service to Watford households comprising:

1. To make the recycling service more efficient and generate cost savings the recycling collection will move to fortnightly for houses and flat blocks of 5 or less. Research has shown that around 78% of local authorities in England collect co-mingled recycling on a fortnightly basis, as well as eight out of ten Hertfordshire authorities.

2. Residual and garden waste, no change to fortnightly collections.
3. Food waste, no change to weekly collections.
4. Flat blocks of 6 or more, no change to weekly recycling collections.

lii **Who has been identified as potentially being impacted by the proposals?**

- All residents in Watford will be impacted
- Residents in the borough who currently use the service to dispose of their recycling

2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

3. Engagement and consultation

Prior to the waste and recycling service change in 2020 engagement was carried out with the community, as these results are still relevant it is proposed that these results are used as the basis of this EIA.

Over the summer of 2019, the council undertook two engagement exercises to gauge people's current perceptions of waste and recycling services. The engagement channels were an online survey (a more traditional approach) and a chatbot survey, through Facebook messenger. The reason for undertaking the two exercises was to reach a wider range of local people than a single approach would have achieved – with the relatively new chatbot approach consistently reaching a younger audience than that reached through an online survey. This was borne out by the demographics collected through both engagement exercises.

1. ONLINE SURVEY

IN FIELD: 30 July – 10 September 2019
RESPONSES: 398

2. CHATBOT SURVEY (DEPLOYED THROUGH FACEBOOK MESSENGER)

IN FIELD: 27 August – 6 September 2019

RESPONSES: 547

Age profile of respondents

The online survey received the most responses from those in the 35-44 age range (26%), followed by 45 -54 years at 24% whilst the chatbot survey was in the age group 18-30 years.

Sex of respondents

Unexpectedly, there was a very significant difference in the profile of those answering the online survey – with 75% of respondents coming from women. In contrast, the chatbot survey was much more in line with the profile of the Watford population – with 52% male (slightly high) and 48% female (slightly low).

Ethnicity of respondents

Only the online survey asked regarding people's ethnicity. 79% of respondents were White British, which is a higher percentage than in the population with the next highest category being 'White Other'. The EIA, therefore, needs to take into account what is known of the Watford population (see below) in considering ethnicity impacts as these will not necessarily be picked up through the views shared in the survey.

Health of respondents

15% of respondents declared their day to day activities are limited by disability / health related issues. Again, this EIA needs to take into account what is known of the Watford population (see below) in considering disability related impacts as these will not necessarily be picked up through the views shared in the survey.

4. What we know about the Watford population

across the borough but with a noticeably large number living in rented accommodation. Whilst it is a prosperous town, it does, like most areas, have pockets of relative deprivation.

The waste and recycling service is what is known as a 'universal' service, one that all households receive. In terms of the current proposals, the changes are directed at 'low rise' households (i.e. not flats / apartments that have communal facilities). Understanding the Watford population provides guidance on how the proposals will impact both positively and negatively.

Population

The current population of Watford is 102,246 (2021 census).

The population density for Watford is circa 4,772 people per square kilometre. This makes it the most second most densely populated district area in the East of England. However, in comparison with some metropolitan boroughs, particularly those in and around the outskirts of London, the density is relatively low.

Ward level populations

2021 year population estimates show Central has the highest population of any ward in Watford and Tudor the lowest at 7,114.

	2021
Callowland	8,704
Central	10,472
Holywell	9,886
Leggatts	8,397
Meriden	8,070
Nascot	9,071
Oxhey	7,179
Park	8,638
Stanborough	7,583
Tudor	7,114
Vicarage	9,160
Woodside	7,972

This is ONS data from 2021

Population changes

Between the last two censuses (held in 2011 and 2021), the population of Watford increased by 13.2%, from around 90,300 in 2011 to around 102,200 in 2021.

The population here increased by a greater percentage than the overall population of the East of England (8.3%), and by a greater percentage than the overall population of England (up 6.6% since the 2011 Census).

Households

The average household size in Watford is currently 2.45. This is average for the Eastern region.

Number of households

The ONS data, based on the 2021 census, says that there were 39,628 households in Watford. The number of households is significant for the waste and recycling service and, for a district authority, it is known that the biggest pressure on future budgets is the need to deliver the service to a growing number of households

Household size

The 2016 projections estimate that, between 2016 and 2041:

- Watford’s average household size will decrease from 2.45 to 2.33
- England’s average household size will decrease from 2.37 to 2.26

Household Composition

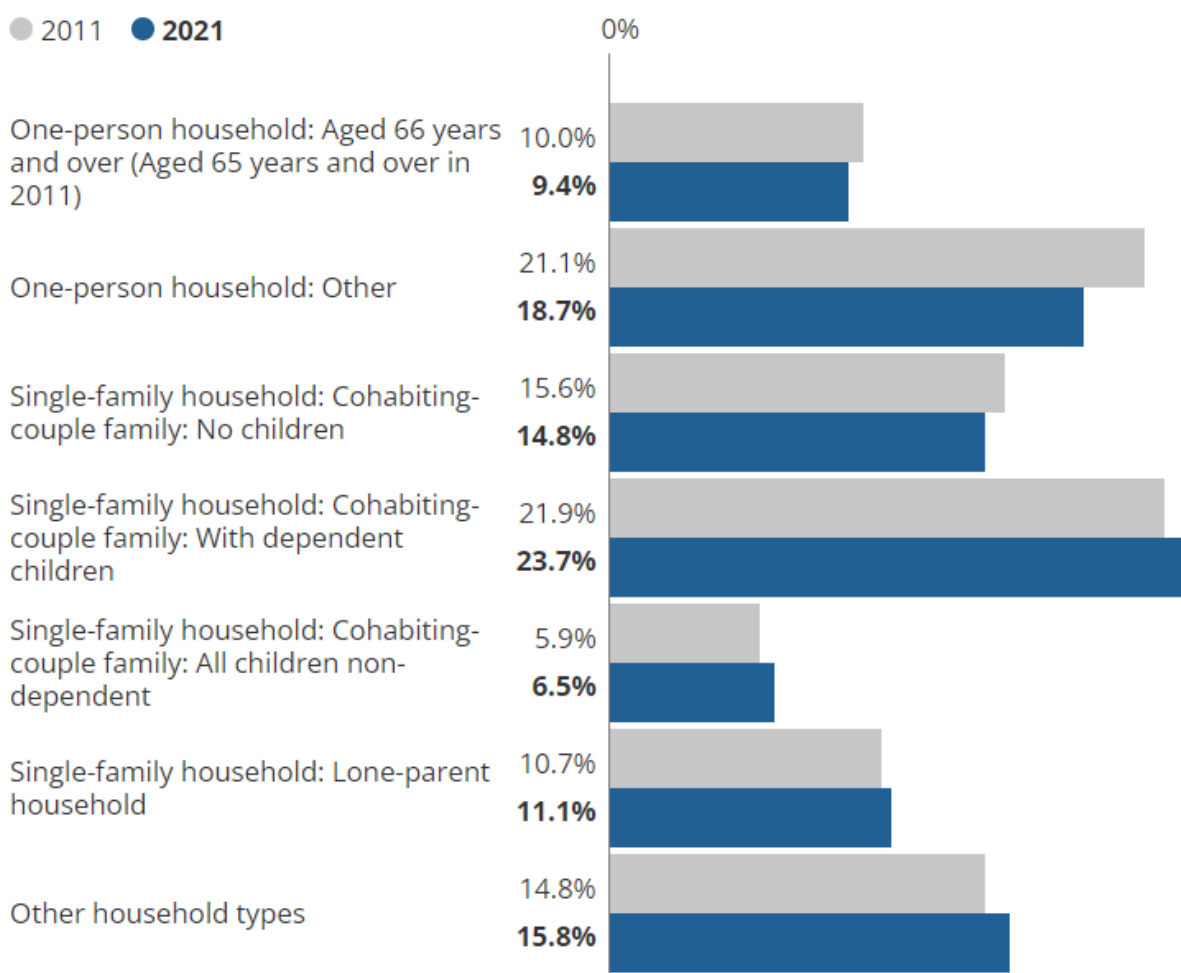
The percentage of households including a couple with dependent children increased in Watford, but fell across the East of England.

In Watford, the percentage of households including a couple with dependent children rose from 21.9% in 2011 to 23.7% in 2021. During the same period, the regional percentage fell from 21.0% to 20.2%.

The percentage of households including a couple without children in Watford fell from 15.6% to 14.8%, while the percentage of households including a couple with only non-dependent children increased from 5.9% to 6.5%.

Percentage of households by household composition, **Watford**

● 2011 ● 2021



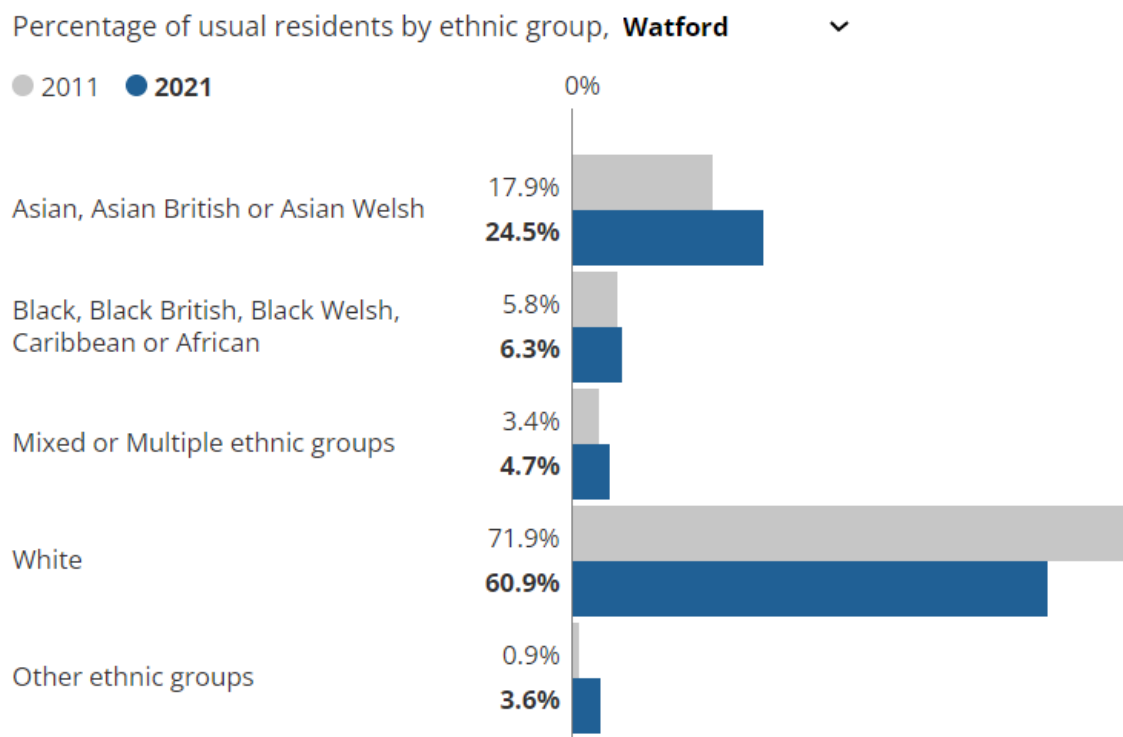
Source: Office for National Statistics – 2011 Census and Census 2021

Sex / gender of population

In terms of gender breakdown, there are estimated to be fractionally more female than male residents but the difference is not significant. Research tends to show females recycle more than males.

Ethnicity

Watford has a very diverse population, more so than the rest of Hertfordshire, the percentage breakdown by ethnic groups is provided below.



Source: Office for National Statistics – 2011 Census and Census 2021

Language spoken at home: Other data sources, including school language survey on the languages spoken by Watford school children at home, endorse the National Insurance findings with English still the predominant language (at around 60%) followed by (in order of selection): Urdu, Polish, Tamil, Romanian, Gujarati, Pahari, Gujarati and Hindi.

Births and origin of parents: In 2018, nearly 60% (59.6%) of children born to Watford based parents, had one or both parents born outside of the UK, with 41.7% having both parents born outside of the UK. 52.3% of new mothers in Watford were born outside of the UK (1397 births in total, with 667 to mothers born in the UK and 73 born outside of the UK. Of these 252 mothers had been born in the Middle East and Asia and 257 in the ‘new’ EU countries – those that had joined since 2004, including Poland, Rumania and Bulgaria).

Electorate: The electorate on the electoral register (as published on 1 December 2018 was 70,544, with a further 3,642 identified as potential electors. The main ethnicity groups were identified as:

British	58,329
Romanian	1,842
Polish	1,560
Rep of Ireland	1,289
Indian	1,062
Italian	805
Portuguese	703
Pakistani	652
Sri Lankan	418
Spanish	364
French	337
Bulgarian	215

Numerous other nationalities with electorates totalling 1 or more but less than 200.

Age

The largest populations by age band in Watford in 2021 were:

- 35-49 (24%)
- 50-64 (16.9%)

Age	Total %
Age 0 - 4	6.4
Aged 5-9	6.7
Aged 10-15	7.7
Aged 16-19	4.2
Aged 20-24	5.2
Aged 25-34	16.2
Aged 35-49	24.1
Aged 50-64	16.9
Aged 65-74	6.7
Aged 75-84	4.1
Aged 85 years and over	1.8

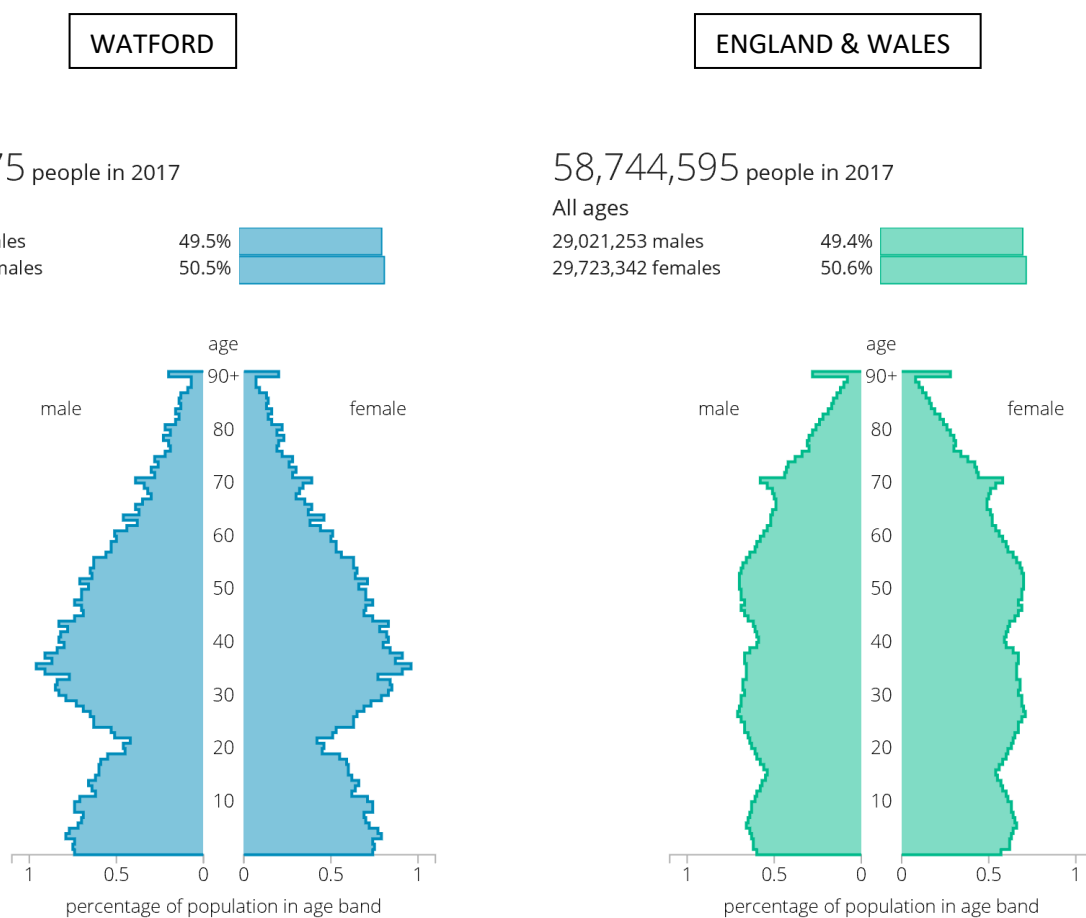
Between the last two censuses, the average (median) age of Watford increased by one year, from 35 to 36 years of age.

This area had a lower average (median) age than the East of England as a whole in 2021 (41 years) and a lower average (median) age than England (40 years).

The median age is the age of the person in the middle of the group, meaning that one half of the

group is younger than that person and the other half is older.

The number of people aged 35 to 49 years rose by just under 3,900 (an increase of 18.7%), while the number of residents between 20 and 24 years fell by around 400 (6.6% decrease).



Disability / Health

Around 85% of the population of Watford state that they have ‘good health’ and just under 14% record a disability. We do not have details as to what these disabilities are but they will include a wide range of physical and mental health disabilities or impairment.

The 2018 NHS Health Profile’s summary conclusion is that the health of people in Watford is ‘varied’ compared with the England average. About 12% (2,300) of children live in low income families – this is an improvement on 2016 (14% / 2,700). Life expectancy for both men and women is similar to the England average, although life expectancy is 6.6 years lower for men and 3.4 years lower for women in the most deprived areas of Watford than in the least deprived areas.

The profile also shows that physically active adults (19 years +) is 68% for Watford compared to the England average of 66%. There has been a decrease from the 2017 profile in the percentage of adults classified as overweight / having excess weight from 60% to 55%, which is better than the England average of 61%. The percentage of obese children in Year 6 (aged 10-11) at 21% is significantly worse than in the 2017 Health Profile; the England average is 20%.

Religion / belief

The religious breakdown in the Census 2021 of the main religions in Watford was: Christian (44.4%), Muslim (13%), Hindu (8.2%), with no religion stated at 24.8%.

Sexual orientation / Transgender

- In 2014, 1.6% of adults in the UK identified their sexual identity as lesbian, gay or bisexual
- The likelihood of an adult identifying as lesbian, gay or bisexual decreased with age. Around 2.6% of adults aged 16 to 24 years identified themselves as lesbian, gay or bisexual. This decreased to 0.6% of adults aged 65 and over

Watford currently has no specific data on the LGBT community within the borough.

Data from the 2021 census is shown below:

Sexual Orientation

	Persons	
	Watford Local Authority	
	count	%
All usual residents aged 16 and over	80,961	100.0
Straight or Heterosexual	72,016	89.0
Gay or Lesbian	914	1.1
Bisexual	962	1.2
Pansexual	70	0.1
Asexual	48	0.1
Queer	12	0.0
All other sexual orientations	180	0.2
Not answered	6,759	8.3

In order to protect against disclosure of personal information, records have been swapped between different geographic areas and counts perturbed by small amounts. Small counts at the lowest geographies will be most affected.

Source: ONS - 2021 Census (TS079)

Deprivation

The English Indices of Deprivation 2019 was published by the Government in September 2019, and updates the previous 2015 Indices, published in September 2015. The Indices of Deprivation measure relative levels of deprivation in 32,844 small areas or neighbourhoods, called Lower-layer Super Output Areas, in England

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019

The IoD2019 uses 39 separate indicators, grouped into seven domains (three of which contain sub-domains); the domains are Income; Employment; Health and Disability; Education, Skills and Training; Crime; Barriers to Housing and Services; and Living Environment. These are weighted to calculate the Index of Multiple Deprivations (IMD) 2019. In addition to the domains and their sub-

domains there are two supplementary income deprivation Indices: Income Deprivation Affecting Children Index (IDACI) and Income Deprivation Affecting Older People Index (IDAOPI).

In the IMD 2019, Watford is ranked 195 out of 317 authorities, putting it in the 7th decile nationally. This means that, overall, Watford is less deprived than half the authorities in England.

Watford is the third most deprived authority in Hertfordshire. (Stevenage and Broxbourne are the most deprived.) However, three Hertfordshire authorities are among the 10% least deprived authorities in England (Three Rivers, East Herts and St Albans).

Overall, Watford is not an area with significant deprivation issues and the majority of the LSOAs within the town are in the bottom 50% of LSOAs nationally for deprivation; the borough's position has improved relative to that of 2015.











The combined deprivation index, which weights income and employment more heavily than the other domains, obscures the more deprived areas in Watford, which are affected by crime, living environment deprivation and education, skills and training deprivation in particular. This is, at least in part, because income and employment deprivation are less of an issue for Watford than for other areas.

The ten most deprived LSOAs in Watford, as ranked in the IMD 2019 are as follows:

Watford rank	Ward	LSOA code	Hertfordshire		England	
			Rank	Decile in Herts (1st = most deprived)	Rank	Decile (1st = most deprived)
1 (1)	Central (Water Lane, Gladstone Road, Grosvenor Road, part of Radlett Road, Brockleberry Close, Raphael Drive, top part of Queens Road)	E01023860 (009B)	5 (5)	1st (1st)	5055 (5005)	2nd (2nd)
2 (3)	Holywell (Caractacus Green, part of Charlock Way, Moor View, Jellicoe Road, Stripling Way, Rose Gardens)	E01023865 (011C)	21 (22)	1st (1st)	7239 (7800)	3rd (3rd)
3 (2)	Meriden (Garsmouth Way, Aldbury Close, Harvest End, part of York Way)	E01023876 (003D)	26(19)	1st (1st)	7924 (7590)	3rd (3rd)
4 (4)	Holywell (Ascot Road, Greenhill Crescent, Caxton Way, Croxley View)	E01023866 (011D)	27 (30)	1st (1st)	8294 (9203)	3rd (3rd)
5 (7)	Woodside (Haines Way, Queenswood Crescent, Sheriff Way, Nottingham Close)	E01023906 (001C)	61 (41)	1st (1st)	10719 (10062)	4th (4th)
6 (10)	Oxhey (Deacons Hill, Blackwell Drive, Riverside Road, Eastbury Road, Thorpe Crescent)	E01023883 (012B)	62 (49)	1st (1st)	10758 (10710)	4th (4th)
7 (13)	Callowland (Maude Crescent, St George's Road, Breakspere Close, Nicholas Close)	E01023857 (006C)	67 (56)	1st (1st)	10894 (10812)	4th (4th)
8 (9)	Meriden (Gaddesden Crescent, Bovingdon Crescent, Garston Lane)	E01023877 (003E)	73 (75)	2nd (2nd)	11225 (11837)	4th (4th)
9 (12)	Leggatts (The Harebreaks, Chestnut Walk, Foxhill, Brushrise, Elm Grove)	E01023870 (004C)	78 (52)	2nd (1st)	11515 (10734)	4th (4th)
10 (5)	Stanborough (Clarke Way, Rushton Avenue, Orbital Crescent, Harris Road)	E01023891 (002B)	92 (31)	1st (1st)	11970 (9377)	4th (3rd)

MOSAIC profile

Our MOSAIC profiling of the borough enhances our understanding of our population and provides valuable context for our decision-making. MOSAIC types have different propensities in terms of recycling, with some types far more active recyclers than others

	Mosaic Code	Name	Description	Number of Household	2017 Watford %	2016 Watford %	Difference	Trend	Rank (last year)
1	J40	Career Builders	Singles and couples in their 20s and 30s progressing in their field of work from commutable properties	4,045	12.5%	11.9%	0.6%		1
2	I36	Cultural Comfort	Thriving families with good incomes in multi-cultural urban communities	3,321	10.3%	8.7%	1.6%		2
3	D14	Cafes and Catchments	Affluent families with growing children living in upmarket housing in city environs	2,499	7.7%	8.0%	-0.3%		3
4	D17	Thriving Independence	Well-qualified older singles with incomes from successful professional careers living in good quality housing	2,422	7.5%	5.4%	2.1%		7
5	M56	Solid Economy	Stable families with children renting better quality homes from social landlords	2,172	6.7%	6.4%	0.3%		6
6	J44	Flexible Workforce	Young renters ready to move to follow worthwhile incomes from service sector jobs	1,954	6.0%	7.0%	-1.0%		4
7	H35	Primary Ambitions	Forward-thinking younger families who sought affordable homes in good suburbs which they may now be out-growing	1,550	4.8%	6.8%	-2.0%		5
8	808	Premium Fortunes	Influential families with substantial income established in large, distinctive homes in wealthy enclaves	1,237	3.8%	3.2%	0.6%		10
9	I37	Community Elders	Established older households owning city homes in diverse neighbourhoods	1,128	3.5%	4.1%	-0.6%		8
10	I39	Ageing Access	Older residents owning small inner suburban properties with good access to amenities	1,099	3.4%	3.4%	0.0%		9

Watford's MOSAIC profile (2018)

Career Builders tend to have less propensity to recycle than average as do Cultural Comforts, whereas Cafes and Catchments have a greater propensity. This provides useful insight into both the challenges the council faces in terms of encouraging greater recycle but also the opportunities in terms of increasing its current recycling rate of 45% and reducing the amount of waste that could be recycled that is being disposed of in black bins.

5. How will the council ensure equality is promoted through the proposed change in frequency of recycling collections

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the change in frequency of recycling collections

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

A. Positive impacts

Potential positive effects based on what you know from your analysis

- The council is clear that it needs to encourage more waste reduction and follow the waste hierarchy with prevention and reduction. Reducing the borough’s impact on the environment and use of natural resources is beneficial to all our population and is a positive response to the council’s declaration of a climate emergency. Refreshed communications material to residents will assist residents in thinking about ways to prevent and cut down on the amount of waste produced.



- The efficiency of rounds through round optimisation will have a positive impact in cutting down the number of vehicles on the road and thereby reducing the council’s carbon emissions.
- Food waste - the Waste Compositional Analysis carried out in March 2023 highlighted that there are still opportunities being missed by residents to recycle food and eat the food they buy. Data from the analysis showed that 24.5% of the residual bin is food waste. Getting this out of the residual stream and recycled or, even better, not thrown away in the first place can have an impact on the overall recycling rate. Research also shows that when people realise how much food waste is being disposed of, they tend to take steps to reduce how much their household is throwing away – which is beneficial in terms of the environment but also people’s personal spending. This could be of particular benefit to those with larger households / families and greater call on their disposable income, reducing food waste in the home can also help residents save up to £720 per year.
- Given the pressure on council budgets, the current service is unaffordable and unsustainable. Changing the frequency of recycling collections will generate savings on the cost of providing the service and mitigate against future service pressures.

B. Negative impacts

Potential positive effects based on what you know from your analysis

The analysis of the Watford population shows the diversity of the borough and highlights a number of potential impacts the changes could have on Watford residents. In addition, the responses to the engagement activities carried out prior to the service change in 2020 shows that there is less positive feedback about some of the proposals from different parts of the Watford community. In particular, there is a correlation between age and the responses to change, with those of a younger profile more open to change.

In response to the needs of its communities and the feedback on the changes, the council has in place a range of support for those who might be more significantly impacted.

- Larger families with children

There is a potential negative impact on those with larger families with children in relation to the move to a fortnightly recycling collection. This is because the council acknowledges that the more people in a home, the more waste is generated. In these cases the council offers: option to leave out additional correctly sorted and labelled recycling, larger/additional recycling bins on proof of a household of five or over. Excess waste sacks and nappy sacks are available for dealing with excess non-recyclable waste.

- Older people and people with disabilities

The council offers an assisted waste collection and this will continue to apply to the recycling bin.

Clinical waste collections or larger bins for non-recyclable waste will also continue for those with needs around items such as incontinence pads / needles etc.

- BAME communities

Standard recycling bins may not have enough capacity large for larger households / families. Certain BAME families have a higher likelihood of living in a larger family. Therefore, a change in collection frequency may impact negatively on some of Watford BAME communities.

The diversity of Watford means that for a significant proportion of the Watford community, English is not the first language. This could be a barrier to understanding the service changes should they be endorsed. We will ensure that communication and publicity materials illustrate diversity in a positive way and promote participation across all ethnic groups. The communications will be highly visual to reduce the need for large explanatory notes and the council's own website will offer the basic information on service changes – this features the browsealoud function that translates information into a variety of languages

- People in flats of blocks of six properties or above

There is no change to the frequency of waste collections in these properties.

6. Overall conclusion

The changes to the waste and recycling service have both positive and negative impacts for those affected residents.

Overall, the council believes that the changes will reduce the impact on the council budget and make savings on future service costs. It is a direct response to the financial challenges the council faces and, by making the service more efficient, it reduces the risks to other service areas which the council is responsible for delivering. Recycling across the borough is still a top priority, which is of benefit to everyone given the acknowledged impact on the environment of items such as single use plastics. The council will continue to provide reliable and regular recycling service and provide solutions for larger households to ensure the capture rate of recyclable material remains high with a fortnightly service. Residents in flats will continue to receive a weekly recycling service. The introduction of garden waste subscription

There are negative impacts of the changes, which the council is taking steps to mitigate through careful targeting of support and advice. It is recommended the council keeps these under review during the implementation of the changes to assess whether the impacts are sufficiently mitigated or whether it needs to assess if further interventions are required.

This EIA has been updated to consider the impacts of the move to fortnightly recycling collections and has identified the following mitigation measures:

1. Households of 4 or more permanent residents are entitled to an additional 240 litre recycling bin. Available on application.
2. Households who currently have a 140 litre recycling bin are entitled to swap it for a 240 litre recycling bin. Available on application.
3. All residents are allowed to put out additional side recycling if clearly marked or in a clear sack. Limited to 3 consecutive collections

Excludes households with access to communal recycling facilities.

Excludes blocks of flats with 5 or more properties.

Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
Waste reduction and reminder on the range of items that can be recycled	All	<p>Maintain a positive and engaging communications and engagement campaign for residents to highlight the benefits of how to, and the benefits of reducing their waste and the wider, global community.</p> <p>Comprehensive information on how to recycle effectively with advice on maximising space in the bin.</p> <p>Undertake targeted campaigns in areas where recycling rates</p>
Efficient rounds – reduction in carbo emissions	All	<p>Maintain a positive and engaging communications and engagement campaign for residents to understand the benefits of carbon reduction.</p>
Food waste collections	All	<p>Maintain a positive and engaging communications and engagement campaign for residents to refresh their participation in food waste recycling and reduction by eating the food they buy.</p> <p>Reminder of the positive outcomes of food waste recycling and financial incentive of reducing food waste.</p>

Positive Impact	Protected characteristics	Ways to ensure the positive impact
Impact on council budget of not changing the frequency of recycling collections	All	Ensure that people understand the council's financial pressures and how changing the frequency of collections reduces this pressure.

Summary of potential negative impacts and ways in which they can be removed or mitigated

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
Larger families / individuals generating more recycling over the fortnight collection period	Age (those with families) BAME Disability	<p>A larger bin/additional recycling bin is available for households of five plus (on submission of proof)</p> <p>Clearly labelled, correctly sorted additional recycling will be taken on collection day</p> <p>Nappy sack provision is unchanged</p> <p>Excess waste sack provision is unchanged</p> <p>Clinical waste collections are unchanged</p> <p>Maintain a positive and engaging communications and engagement campaign for residents to embed the</p>

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
		positive outcomes of recycling
Lack of understanding / confusion about the service changes	All but possibly more likely to be: Ethnicity Disability (learning related)	Ensure the communications and engagement campaigns are attractive, very visual and target areas where we know there might be more people where English is not a first language – directing them to the council’s website where translations are available

This EIA has been approved by:

..... **Date**