

## H&F Equality Impact Analysis Tool

### Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the [public sector equality duty](#) which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

## General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

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Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	25 / 26 Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Tidy Streets – Commercial Waste Time Banding for Uxbridge Road and King Street</p> <p>Short summary:</p> <p>Following an EIA completed in August 2025, appended to a report recommending consultation on time banded commercial waste collections in King Street and Uxbridge Road, this EIA has been updated to reflect the responses to the consultation.</p> <p>The aim of time banding is to ensure a cleaner, more pleasant and more accessible street environment. If, following consultation, it is decided to proceed, time banding regulations will create specific time slots throughout any given 24-hour period, when businesses can present their waste and recycling bags out on the public highway for collection.</p>
Lead Officer	<p>Name: Annie Baker</p> <p>Position: Assistant Director, Street Environment Services</p> <p>Email: <a href="mailto:annie.baker@lbhf.gov.uk">annie.baker@lbhf.gov.uk</a></p> <p>Telephone No:</p>
Date of completion of final EIA	XX / XX / XX

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing:</p> <p>This Equality Impact Assessment is being completed as part of the final decision whether to proceed or not with time banded commercial waste collections in two of the borough's high streets includes consideration of feedback from the consultation process. It will be appended to a key decision report for the Cabinet Member for Public Realm in February 2026.</p>

<b>Analyse the impact of the policy, strategy, function, project, activity, or programme</b>	<p>Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.</p>		
<b>Protected characteristic</b>	<b>Analysis</b>	<b>Impact:</b> Positive, Negative, Neutral	
Age	<p>There is potential for the proposal to have a positive impact on more elderly residents by limiting the periods where commercial waste can be placed on the pavement which should lead to safer walking environments. While benefits are particularly relevant for older residents, improved pavement accessibility also supports younger people, including children and young adults, by reducing trip hazards.</p>	Positive	
Disability	<p>Town centre users with mobility difficulties should benefit by the proposals as there will be improved accessibility due to reduced street clutter during the daytime. Feedback from consultation explicitly referenced waste on pavements as a major accessibility barrier. Reduced clutter directly supports individuals with mobility, visual, and cognitive impairments.</p>	Positive	
Gender reassignment	<p>It is not anticipated that individuals with this protected characteristic will be disproportionately affected by the proposals. Consultation feedback did not identify any concerns specific to trans or non-binary people. Trans and non-binary individuals may experience heightened vulnerability in public spaces due to societal stigma. Cleaner, less cluttered streets could improve feelings of safety and dignity.</p>	Positive	
Marriage and Civil Partnership	<p>It is not anticipated that individuals with this protected characteristic will be disproportionately affected by the proposals.</p>	Neutral	
Pregnancy and maternity	<p>For parents of young children there is likely to be a positive benefit arising from the proposals as keeping the pavements free of obstruction will improve accessibility in town centre locations</p>	Positive	
Race	<p>It is not anticipated that individuals with this protected characteristic will be disproportionately affected by the proposals. To mitigate any potential barriers</p>	Neutral	

		for residents or businesses with limited English proficiency, communications will be produced in accessible formats and alternative languages upon request.	
	Religion/belief (including non-belief)	It is not anticipated that individuals with this protected characteristic will be disproportionately affected by the proposals. As there are three collection slots proposed for each collection day, we did not receive any feedback from consultation that the times proposed could inadvertently clash with religious observances or prayer times, especially for businesses run by observant individuals. However, we will continue to review this if the proposals are enacted. The provision of multiple daily time-bands reduces the likelihood of indirect impacts relating to prayer times or observance	Neutral
	Sex	No direct impacts are anticipated; however, indirect benefits may arise from improved safety and navigability for women, especially those with caring responsibilities	Positive
	Sexual Orientation	It is not anticipated that individuals with this protected characteristic will be disproportionately affected by the proposals. Evidence from wider community safety research indicates that well-maintained, decluttered spaces reduce the likelihood of anti-social behaviour, which can disproportionately affect LGBTQ+ individuals	Positive
	Care Experienced as a Protected Characteristic	. While no direct impacts are anticipated, officers remain mindful that care-experienced people may experience broader socio-economic vulnerability and will monitor for any unintended impacts	Neutral
	<b>Human Rights or Children's Rights</b> If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice		
	Will it affect Human Rights, as defined by the Human Rights Act 1998? No		
	Will it affect Children's Rights, as defined by the UNCRC (1992)?		

	No
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<b>Section 03</b>	<b>Analysis of relevant data</b> Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
<b>Documents and data reviewed</b>	Data reviewed includes consultation responses, street accessibility feedback from Disabled Residents Forum, previous casework relating to waste presentation, and officer observations of pavement obstruction in the affected street
<b>New research</b>	

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	<p>A public consultation took place from 14 November – 12 December 2025 to consult on proposed time bands for commercial waste collections on Uxbridge Road and King Street.</p> <p>The main consultation method was online via the council's "Have Your Say" platform.</p> <p>Leaflets were sent to 1303 addresses neighbouring King Street and 1270 addresses neighbouring Uxbridge Rd, with an offer to provide the leaflets in another language or in other formats.</p> <p>Stakeholder events were held with the Inclusive Environment Disabled Residents forum and Hammersmith BID.</p> <p>E-mails were sent to a further 183 stakeholder groups.</p> <p>Over 200 individual business premises across the two streets took place as part of the consultation.</p>
<b>Analysis of consultation outcomes</b>	<p><b>King Street</b></p> <ul style="list-style-type: none"> <li>- 59 responses. 45 business owners/managers, 8 living on or nearby King Street, 3 waste collection companies, 2 respondents who worked on King Street and 2 visitors to King Street.</li> <li>- Overall support – 48 (84%) support, 6 (11%) neutral, 3 (5%) do not support.</li> <li>- Feedback included a request for strict placement of sacks so as not to impeded people with mobility issues and welcoming the proposals to mitigate the unsightliness of waste presentation.</li> </ul> <p><b>Uxbridge Road</b></p>

	<ul style="list-style-type: none"> <li>- 148 responses. 90 living on or near Uxbridge Rd, 53 business owners/managers, 2 visitors, 1 waste collection company, 1 works on Uxbridge Rd and 2 “other”.</li> <li>- Overall support – 124 (84%) support, 14 (10%) neutral, 6 (4%) do not support.</li> <li>- Feedback included a response from a respondent identifying as disabled, who supported the proposals as they find waste on pavements a big accessibility issue. Another respondent noted that excessive waste on the streets impinges accessibility and is a visual blight.</li> </ul> <p>There was no feedback identifying that the proposals would have a negative impact on any groups sharing protective characteristics. Where protected characteristics were referenced, the feedback was that the proposals would improve accessibility and have a positive impact.</p> <p>However, as per section 7 of this EIA, should the proposals be enacted we will carry out a full review to see whether any negative impacts on groups sharing protected characteristics become evident, and what mitigations can be put in place in such an event.</p>
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<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	The consultation and data review did not identify any disproportionate negative impacts on protected groups. Identified impacts are either positive or neutral. Ongoing monitoring will ensure any emerging impacts are identified early

<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
<b>Outcome of Analysis</b>	Whilst the consultation did not identify any potentially disproportionate negative impact on any individual exhibiting one or more identified protected characteristics, should the proposals be enacted then we will review the service and ensure that we put in place mitigations to any identified impacts and update the EIA accordingly. Mitigations will focus particularly on accessibility for disabled people, older residents and people with prams or mobility aids

<b>Section 07</b>	<b>Action Plan</b>
<b>Action Plan</b>	Note: You will only need to use this section if you have identified actions as a result of your analysis

	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan	
	Communicating decision.	Communication plan to be delivered post decision if enacted, ensuring that all stakeholders are aware when and where the bands will be enacted. Ensure that all communications are accessible	Spring 2026 approx.	Annie Baker, SES	That all businesses and local residents will be aware of the parameters of time banding.		
	Accessible communication for non-English speakers	Provide translated summary materials and ensure comms are designed using plain-English and inclusive guidelines.			Improved accessibility and compliance for diverse business owners.		
	Enforcement	Enforcement plan to be put in place if proposals enacted to ensure compliance. Also to include public reporting mechanism whereby residents can notify enforcement of non-compliance.	Spring 2026	Mo Basith, LET	That all stakeholders are aware of the time restrictions and residents and visitors have a reporting facility.		
	Feedback	Ensure that there is a route for feedback from residents and	Spring 2026	Annie Baker, SES	To ensure that positive and negative		

		businesses once proposals are enacted to inform any changes to the scheme or future expansion of the scheme.			feedback can be used to inform future decision making.	
	Review EIA	Using feedback to review the EIA six months after proposals enacted	Autumn 2026 approx.	Annie Baker, SES	To ensure mitigations to any identified negative impacts on groups sharing protected characteristics are put in place	
	Engagement	Working with BID, DRF, or via targeted comms to businesses with multilingual needs.				
	Monitoring	KPIs (e.g., number of accessibility related complaints before/after implementation).				

<b>Section 08</b>	<b>Agreement, publication and monitoring</b>
<b>Senior Managers' sign-off</b>	Name: Position: Email: Telephone No: Considered at relevant DMT:
<b>Key Decision Report (if relevant)</b>	Date of report to Cabinet/Cabinet Member: XX / XX / XX Key equalities issues have been included: Yes/No

**Equalities Advice  
(where involved)**

Name:  
Position:  
Date advice / guidance given:  
Email:  
Telephone No: