



## **Caerphilly County Borough Council - Integrated Impact Assessment**

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Welsh Language (Wales) Measure 2011
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

**PLEASE NOTE:** Section 3 *Socio-economic Duty* only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions.

See page 6 of the **Preparing for the Commencement of the Socio-economic Duty** Welsh Government Guidance.

### **1. Proposal Details**

**Lead Officer:- Rhodri Lloyd, Nicole White**

**Head of Service:- Marcus Lloyd**

**Service Area and Department:- Waste Management**

**Date:- 15<sup>th</sup> June 2023**

**What is the proposal to be assessed?** *Provide brief details of the proposal and provide a link to any relevant report or documents.*

Caerphilly Council's transformation route map outlines a credible plan that the Authority is committed to deliver, with support from Welsh Government to transform the resource and waste service and ensure Caerphilly meets and exceeds statutory performance targets. It seeks to deliver a high-quality service that maximises material quality and supports the transition to a Circular Economy, offering social and economic opportunities. However, to achieve this both the Council and its residents are going to need to work differently. The route map outlines how this long-term change will be achieved.



## **Kerbside Dry Recycling**

A widespread informational campaign will be launched, supported by WRAP's well established "Be Mighty" campaign to reinforce messages of acceptable materials.

The campaign will be further supported by a behaviour change campaign. The campaign will run in tandem with the informational campaign and will focus on the 'why' designed to evoke an emotional response and focus on the impacts of non-participation. To support the behaviour change campaign engagement and education staff will be required to engage with residents on the doorstep to promote and maximise recycling opportunities.

The campaigns will be delivered across various media to ensure that we reach all segments of the community and will feature a range of key messages tailored to the audience.

Alongside this, a 5-step contamination process will be running. This aims to improve/increase resident participation in dry recycling. There is the potential to introduce a section 46 fixed penalty notice as a last resort to non-compliance.

The aim of the contamination process is to provide residents with information, advise and guidance on how to recycle correctly. Our recycling crews are performing visual checks of recycling bins to check that they only contain recyclable materials and do not contain any contamination (non-recyclable items). The following process is in place:-

### **Step 1**

If the bin contains contamination, it will not be emptied. The crew will place a sticker on the bin highlighting the contaminant. The resident should remove the highlighted item before the next scheduled collection. If they are unable to read what is on the sticker, they can call our contact centre (number will be on the sticker). If the resident is physically unable to remove the contaminant, they will receive a visit further along in the contamination process to provide assistance/advice. Alternatively, if they call in and ask for help an officer can visit the resident to assist.

### **Step 2c**

If the bin contains contamination for a second week, the bin will not be emptied. The resident will also receive a letter and an information leaflet with more details about recycling at home. The leaflet will contain the contact centre's number for further advice/guidance. If the resident experiences difficulty due to physical/mental impairment or cannot call our contact centre, further along in the contamination process the resident will automatically receive a visit from a waste officer who can provide assistance.

### **Step 3**

If the bin contains contamination for a third week, the bin will not be emptied. A member of the waste team will attempt to visit the property.

If we are unable to speak with the resident, we will leave a second letter at the property. The letter will explain that if the contaminants are not removed, the bin will be removed. If the resident would prefer correspondence in Welsh they can call our contact centre to request this (we have Welsh speaking staff in the department). Alternatively, if the resident is hearing impaired/British Sign Language user we can source assistance for these special requirements if we are made aware of this.

#### **Step 4**

If the bin contains contaminants for a fourth week, the bin will be removed from the property (in certain situations an officer may assess and offer a different type of container to recycle, for example a box or advise the resident to purchase clear bags).

#### **Step 5**

A legal notice may be served on the property if they fail to comply with the steps above. A visit will be made, and an officer will endeavour to make contact with the resident. This will be a joint visit from CCBC officers, coordinated between waste management, community safety wardens and an Environmental Health Enforcement Officers.

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### **Kerbside Residual**

Development of educational and engagement resources, to be carried out by Recycling Advisors with residents, to better understand the barriers and issues residents are facing.

Engage/inform residents to maximise recycling through the enforcement of existing residual waste policies, that include for top hatting (bags stacked on top of the bin) and side waste.

A strengthened commitment to minimising the quantity of residual waste through the enforcement of existing policies of no 'top hatting' or side waste.

Adopting the recycling contamination policy for residual waste, targeting non-recyclable content that can be diverted from the residual, using S46 notices where necessary.

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Following an appraisal of how some exemplar Authorities are tackling this issue, the waste management team have discussed options with the elected members of the Waste Review Working Group. There was a consensus to include additional elements to the engagement process, specifically to deal with those residents who are



continuing to misuse the service and compromising the laudable endeavours of the majority of the population who participate correctly. The additional elements include i) the issue of legal notice requiring the correct placement of materials in the designated recycling bin ii) failure to comply/resolve within the 21 day period will result in the issue of an issue of a fixed penalty notice. As per established practice with other fixed penalty processes, there are options for reduced rate charges on early payment.

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- 2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**  
*(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristics.*

**2a Age** *(people of all ages)*

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

Positive – Communication will be aimed at reducing the confusion surrounding the materials that can and cannot be recycled, providing people with more confidence in participating in the recycling service. The campaign will be delivered door-to-door so residents can benefit from receiving this information on their doorstep. If a resident does not have the correct containers they need to be able to participate fully, we can be advised of this at the door and arrange for suitable receptacles to be provided.

Neutral – some residents, especially the elderly may not be comfortable answering the door. A calling card/recycling information will be posted along with the telephone number of the contact centre if they wish to contact us for further information. If a resident has a ‘no cold caller’ sticker on their door staff will not knock.

No S46 Notices will be served without offering the opportunity for a face-to-face discussion at least once with the resident.

Information can be provided in any language/format upon request (for example Braille). Residents can make requests in any way they wish (for example by email/telephone/post/in person at one of our offices).

**Negative**

- (ii) If there are negative impacts how will these be mitigated?**

Older people may have longstanding issues with the current service if they do not fully understand what is required of them. They may also suffer from age-related disabilities, not just physical but mental too, such as dementia/memory loss. This campaign seeks to actively speak with those residents to ensure they fully understand and are provided with the materials/information they need to participate correctly and efficiently. We will also look to identify (via email, post, telephone, face to face contact) any age-related barriers to participating correctly and help where necessary.

We also offer an assisted collection service for those that require it. This is available for all services – refuse, recycling and food/garden.



**(iii) What evidence has been used to support this view?**

The following statement is given on the draft consultation document:

To help us ensure that the waste services we provide meet the needs of all residents, if you feel that any of these proposals will affect you differently as an individual because of any of the following (age, disability, ethnic origin, gender, gender reassignment, marital status, religious belief or non-belief, use of Welsh language, BSL or other languages, nationality or responsibility for any dependents or because you or a member of your household are or have been a member of the armed forces) please give details.

Once these needs have been identified (for example an assisted collection service) individuals who need additional support will be assisted.



## **2b Disability** *(people with disabilities/ long term conditions)*

### **(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

Positive – Communication will be aimed at reducing the confusion surrounding the materials that can and cannot be recycled, providing people with more confidence in participating in the recycling service. The campaign will be delivered door-to-door so residents can benefit from receiving this information on their doorstep. If a resident does not have the correct containers they need to be able to participate fully, we can be advised of this at the door and arrange for suitable receptacles to be provided.

Neutral – some residents may find it difficult in getting to the door on time, some may experience anxiety over answering the door to a stranger and some may not be able to come to the door at all. A calling card/recycling information will be posted along with the telephone number of the contact centre if they wish to contact us for further information. If a resident has a 'no cold caller' sticker on their door staff will not knock.

No S46 Notices will be issued without making contact at least once with the resident.

#### **Negative**

### **(ii) If there are negative impacts how will these be mitigated?**

The proposal could have an impact on those with a disability (physical and learning disability, Dementia). Some people may struggle with their bins and the visual instructions.

People with a disability may have longstanding issues with the current service if they do not fully understand what is required of them. For example, people in the deaf/blind community may not understand the recycling information leaflets/letters sent to them. This campaign seeks to actively speak with those residents to ensure they fully understand and are provided with the materials/information they need to participate correctly and efficiently. If they require information in a different language we can provide this.

Once we are made aware of these barriers at the door/over the telephone we can fully support the resident by providing information in any format they may require.



Telephone numbers and email addresses are provided on all correspondence, which is also bilingual. All literature will also link to the council's website. We can provide/cater for specific needs of individuals with disabilities. We can offer information in bespoke formats for example braille, training for staff in British Sign Language. Contact must be made and we must ensure the resident fully understands before any removal of bins/issuing of a legal notice.

**(iii) What evidence has been used to support this view?**

The following statement is given on the draft consultation document:

To help us ensure that the waste services we provide meet the needs of all residents, if you feel that any of these proposals will affect you differently as an individual because of any of the following (age, disability, ethnic origin, gender, gender reassignment, marital status, religious belief or non-belief, use of Welsh language, BSL or other languages, nationality or responsibility for any dependents or because you or a member of your household are or have been a member of the armed forces) please give details below:

**2c Gender Reassignment** *(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)*



- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

**2d Marriage or Civil Partnership** *(people who are married or in a civil partnership)*

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

**2e Pregnancy and Maternity** *(women who are pregnant and/or on maternity leave)*

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

If the pregnancy has an impact on the physical ability of a resident to take part, if we are made aware of this we can provide assistance where needed. For example the assisted collection service.

- (iii) What evidence has been used to support this view?



**2f Race** (*people from black, Asian and minority ethnic communities and different racial backgrounds*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

N/A

What evidence has been used to support this view?

**2g Religion or Belief** (*people with different religions and beliefs including people with no beliefs*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

**2h Sex** (*women and men, girls and boys and those who self-identify their gender*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

**2i Sexual Orientation** (*lesbian, gay, bisexual, heterosexual, other*)

- (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

N/A

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?
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### 3. **Socio-economic Duty** *(Strategic Decisions Only)*

*(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. **Socio-economic disadvantage** means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)*

**Please consider these additional vulnerable group and the impact your proposal may or may not have on them:**

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

#### 3a **Low Income / Income Poverty** *(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)*

##### (i) **Does the proposal have any positive, negative or neutral impacts on the following and how?**

The service is offered to all residents across the County Borough. As a result, all residents will experience an indirect positive impact as the financial burden on the department and the Authority lessens. Ultimately, leading to improvements in more efficient disposal operations. This will be achieved through the authority avoiding fines from Welsh Government for not achieving recycling targets. As stated above, we anticipate recycling to increase which will allow us to avoid substantial financial penalties.



**(ii) If there are negative impacts how will these be mitigated?**

N/A

**(iii) What evidence has been used to support this view?**

The service is available to any individual regardless of their income

**3b Low and/or No Wealth** *(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

The service is available to any individual regardless of their wealth.

**3c Material Deprivation** *(unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

The service is available to any individual regardless of material deprivation.

**3d Area Deprivation** *(where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?*

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?



The service is available to any individual regardless of area deprivation.



**3e Socio-economic Background** (*social class i.e. parents education, employment and income*)

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

The service is available to any individual regardless of socio-economic background.

**3f Socio-economic Disadvantage** (*What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged*)

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

As above.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?

The service is available to any individual regardless of socio-economic disadvantages.

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#### **4. Corporate Plan – Council’s Well-being Objectives**

*(How does your proposal deliver against any/all of the Council’s Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) Well-being Objectives*

##### **Objective 1 - Enabling our Children to Succeed in Education**

Our team of Recycling Advisors will engage with schools to integrate recycling and waste campaigns and engagement sessions into their environment. Additionally, the sessions will incorporate the use of digital tools, specifically interactive games, to enhance the educational experience for children.

These sessions will be underpinned by the objectives noted in CCBC’s Recycling and Waste Strategy. This approach not only promotes environmental awareness by also actively engages children in learning about recycling and waste management.

Schools have been consulted with and are eager to play an active role in these sessions which will further benefit the children, ensuring the information is delivered in a method that is easy to understand. We can also deliver these sessions in English and Welsh.

##### **Objective 2 - Enabling our Residents to Thrive**

Continue to support residents with clear and consistent communication / education about how and why to recycle and become more sustainable with the products that would previously have been considered waste. We will promote reduce, reuse and recycling. We have recruited 6 Recycling Advisors to support our residents, schools and communities.

Effective recycling supports people to live a healthy lifestyle by ensuring positive wellbeing and managing waste sustainably. The campaign will support the reduction in residual waste leading to a more sustainable, circular economy.

Digital tools will be introduced to clearly guide and signpost residents on how to dispose of their waste. Data can be utilised to inform behaviour change campaigns delivered on a hyper local level to support effective and efficient recycling practices.

To ensure residents aren’t excluded because of online resources, our Recycling Advisors and Technical Assistants will play a proactive role in our communities, delivering information, guidance and education to residents at the doorstep.



### **Objective 3 - Enabling our Communities to Thrive**

Continue to support residents with clear and consistent communication / education about how and why to recycle and become more sustainable with the products that would previously have been considered waste. We will promote reduce, reuse and recycling. We have recruited 6 Recycling Advisors to support our residents, schools and communities.

Effective recycling supports people to live a healthy lifestyle by ensuring positive wellbeing and managing waste sustainably. The campaign will support the reduction in residual waste leading to a more sustainable, circular economy.

Digital tools will be introduced to clearly guide and signpost residents on how to dispose of their waste. Data can be utilised to inform behaviour change campaigns delivered on a hyper local level to support effective and efficient recycling practices.



To ensure residents aren't excluded because of online resources, our Recycling Advisors and Technical Assistants will play a proactive role in our communities, delivering information, guidance and education to residents at the doorstep.

#### **Objective 4 - Enabling our Economy to Grow**

The Strategy aims to manage CCBC's waste arisings in the most economically and environmentally efficient way possible. Therefore, reducing financial pressures in the long term and enabling our economy to grow.

Strong recycling performance in Wales may attract inward investment through the development of infrastructure to further support Wales on its journey to become zero waste by 2050.

#### **Objective 5 - Enabling our Environment to be Greener**

The 5 objectives of the Strategy will enable CCBC to provide a cleaner and greener environment, benefitting existing and future generations.

These objectives clearly outline CCBC's ambitions to reduce our levels of residual waste and increase the proportion and quality of recycling. Further to this, creating a service that is much more carbon friendly in comparison to our existing operations.

#### **4a. Links to any other relevant Council Policy** *(How does your proposal deliver against any other relevant Council Policy)*

Waste Strategy  
Decarbonisation  
Well-being Plan  
Corporate Plan

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5. **Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working** *(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)*

**How have you used the Sustainable Development Principles in forming the proposal?**

#### **Long Term**

The proposal will support and encourage better waste and recycling practices in the long term and change people's way of thinking for future generations. The overarching aim is to reduce the total volume of residual waste collected by encouraging people to recycle more of their waste. Ultimately this will allow us to work towards a Circular Economy, reduce carbon footprint and become more resource efficient.

#### **Prevention**

Preventing recyclable waste entering the residual waste stream will contribute to a circular economy, reduce carbon footprint and allow us to become more resource efficient.



## **Integration**

Working with all partners in the waste management sector e.g. CCBC Community Safety Wardens, Waste and Resources Action Programme, WLGA, Welsh Government, external consultants, NRW, neighbouring Local Authorities, digital providers.

This supports our ambition to work 'Towards Zero Waste' the Welsh Government's strategy.

## **Collaboration**

Working with all partners in the waste management sector e.g. CCBC Community Safety Wardens, Waste and Resources Action Programme, WLGA, Welsh Government, external consultants, NRW, neighbouring Local Authorities, digital providers.

This supports our ambition to work 'Towards Zero Waste' the Welsh Government's strategy.

## **Involvement**

As part of the Waste Strategy consultation process.

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## **6. Well-being of Future Generations (Wales) Act 2015**

### **Does the proposal maximise our contribution to the Well-being Goals and how?**

#### **A Prosperous Wales**

The proposal will support Wales in being a 'prosperous society' by encouraging more sustainable waste management and recycling practices. This will be achieved through the encouragement of recycling and reducing reliance on residual disposal methods such as Energy from Waste/Landfill. Supporting the Welsh Government's Circular Economy, reducing carbon footprint and becoming more resource efficient.

#### **Resilient Wales**

The proposal will support and help us work towards a Circular Economy by increasing recycling and reducing the volume of general waste. Initiating this project now is the beginning of us working towards Zero Waste by 2050 and reduce greenhouse gas emissions through the reduction in resource use. This in turn will support biodiversity, which is significantly impacted during the extraction of resources for the products we consume.

#### **A Healthier Wales**

The proposal will encourage and provide employment opportunities, which in turn will benefit people's lifestyles and their mental and physical well-being. It will also provide training for staff to increase their knowledge and provide them the tools they need for potential career progression in the future.



## **A More Equal Wales**

The proposal will support people and our communities by providing employment for people from all backgrounds. Everyone will have the opportunity to speak to an officer on the door-step, receive information. If they are not home they will receive information through their door and will be given the opportunity to contact us via telephone.

## **A Wales of Cohesive Communities**

The proposal will help connect the Authority with the local community through collaborative working, face to face engagement, education etc, whilst also providing additional employment opportunities.

## **A Wales of Vibrant Culture and Thriving Welsh Language**

The proposal will comply with the Welsh Language Measure 2011 in all aspects of education, engagement, communication etc. The proposal is fully compliant with the Welsh Language (Wales) Measure 2011 and associated Welsh Language Standards. The proposal will encourage any service users to speak their first language (Welsh, English or any other).

- Residents will have the opportunity to state their language preference
- We have staff within the department who are able to converse in Welsh whether that be by telephone, text or email
- All information will be available in both English and Welsh.
- Information can be requested in any language or format

## **A Globally Responsible Wales**

The proposal will support and help us work towards a Circular Economy and become a more globally responsible Wales. Initiating this project now is the beginning of us working towards Welsh Government's Towards Zero Waste Strategy, which aims to achieve zero waste by 2050 and reduce greenhouse gas emissions through the reduction in resource use and increasing recycling. This in turn will support biodiversity, which is significantly impacted during the extraction of resources for the products we consume.



## **7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards**

*(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) **Policy Making Standards - Good Practice Advice Document***

### **7a. Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2022-2027 and the Language Profile**

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

**Neutral** - Communication through social media platforms, internet, council website, leaflets, telephone systems etc will all be bilingual.

The department is committed to complying with the requirements of the Welsh Language (Wales) Measure 2011 and as a matter of course issues, all its communications bilingually. The department has a significant proportion of Welsh speakers across all tiers and can communicate both verbally and in the written form to queries and service requests. The department supports all the Welsh Government sustainable waste campaigns, all of which include bilingual narrative and branding. The Waste team supports the National 'Be Mighty' campaign, which is aiming for Wales to become the top recycling nation in the world.

- (ii) If there are negative impacts how will these be mitigated?**

There will be no negative impact on the Welsh language.

- (iii) What evidence has been used to support this view? e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census**

N/A

### **7b. Compliance with the Welsh Language Standards. *Specifically Standards 88–93***

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

Communication through social media platforms, internet, council website, leaflets, telephone systems etc will all be bilingual.

(ii) If there are negative impacts how will these be mitigated?

(iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

**7c. Opportunities to promote the Welsh language** *e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community*

(i) Does the proposal have any positive, negative or neutral impacts on the following and how?

We will ensure that those requiring support to be delivered in Welsh are in no way discriminated against. The service will always be delivered using the service users preferred language.

**If there are negative impacts how will these be mitigated?**

N/A What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

**7d. Opportunities for persons to use the Welsh language** *e.g. staff, residents and visitors*

**Does the proposal have any positive, negative or neutral impacts on the following and how?**

As above

**If there are negative impacts how will these be mitigated?**

**What evidence has been used to support this view?** *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

**7e. Treating the Welsh language no less favourably than the English language**

- (i) **Does the proposal have any positive, negative or neutral impacts on the following and how?**

All communication and information on the website will be available in English and Welsh. This will allow the service user to read/access information in their chosen language.

- (ii) **If there are negative impacts how will these be mitigated?**

- (iii) **What evidence has been used to support this view?** e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census

- 7f. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.**

The service will be fully compliant with the Welsh Language (Wales) Measure 2011/Welsh language standards which will allow and encourage our service users to access information in their preferred language, whether that be English or Welsh.

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## **8. Data and Information**

*(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)*

**Data/evidence** *(Please provide link to report if appropriate)*

In November/December 2022, the council ran a phase of engagement called 'What matters to you?' 93% of respondents agreed that waste collection and recycling services should continue to be a priority when planning council services and budgets for 2022/23 and beyond. Through that same engagement activity, 86% of respondents felt that waste collection and recycling services was as important, or more important to them than 12 months ago. Insight from the 'What matters to you?' phase also suggested that residents appreciate the simplicity of our current recycling system.



In addition, an online 'quick poll' sought additional views on waste and recycling during January 2023. Key insights from this poll, which received 2,632 responses included:

- 79% of respondents said they recycle food waste at the kerbside. From those respondents who don't currently recycle food waste, their reasons for not doing so were primarily that they compost any food waste, they don't waste any food, they don't like the smell/feel its unclean or they don't have any liners to place inside the caddy.
- 99% of respondents said they regularly recycle using their brown bin/recycling box/recycling bags at the kerbside
- 73% of respondents said they regularly make use of the green/garden waste recycling service. From those respondents who don't, their reasons for not doing so were primarily that they don't have any garden waste/a garden or that they use the service but seasonally (not year-round)



Summary reports for the 'What matters to you?' November/December 2022 engagement phase and the 'Caerphilly Conversation – budget setting 2023/24' engagement programme can be found at [www.caerphilly.gov.uk/caerphillyconversation](http://www.caerphilly.gov.uk/caerphillyconversation)

## Key relevant findings

Overall, the findings suggest that the public do not want change. The service is easy and convenient for a large majority of our residents and they are happy with the way things are. However, we are always looking at ways to improve our services and we need change to ensure the Authority remains financially stable now and in the future. Making changes now will secure this for the Authority. The survey was undertaken during the Covid-19 pandemic, the context has now changed, and we are in a different situation environmentally and financially to what we were at the time of the survey.

In responding to the climate emergency, Caerphilly has pledged to become net zero by 2030, reducing consumption and decarbonising the waste and recycling services, is a key part of meeting this pledge.

The Welsh Government, Towards Zero Waste strategy (2010), set out a series of challenging recycling targets for Local Authorities and through the Waste (Wales) Measure (2010), made the targets from 2012-13 and beyond, statutory. This status allows Welsh Government to levy financial penalties against Council's that fail to achieve them. The statutory targets are weight based and have increased gradually over time. These are outlined below:

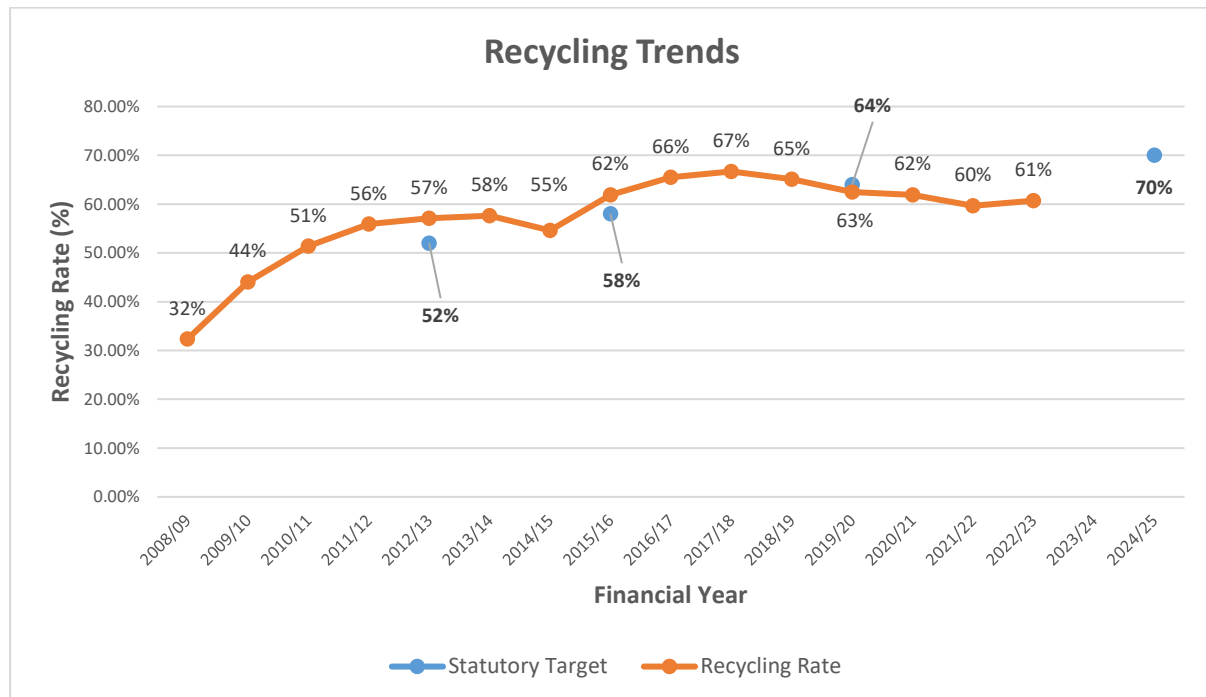
Table One: Welsh Government Recycling Targets 2010 - 2025

	2010/12	12/13	15/16	19/20	24/25
Min. levels of reuse & recycling/composting (or AD)	40%	52%	58%	64%	70%
Min. proportion of reuse/recycling/composting from source separation*	80%	80%	80%	80%	80%
Max. level of landfill	-	-	-	10%	5%
Max. level of energy from waste	-	-	42%	36%	30%
Min. levels of preparing for reuse (excluding Waste Electrical and Electronic Equipment (WEEE))	-	0.4%	0.6%	0.8%	1.0%



Caerphilly has historically performed well against these targets, achieving 66.7 percent in 2017-18, significantly higher than the then target of 58 percent. However, over the last three years recycling performance has declined and since 2019-20 has performed below the 64 percent target. Caerphilly's recycling performance is outlined below.

Graph 1 – Recycling Trends



In the current national Welsh Government waste strategy, Beyond Recycling - A Strategy to make the Circular Economy in Wales a reality (2021), the Welsh Government has stated they will work with Local Authorities and other key partners to develop further future recycling targets in line with their pathway to zero waste, with the ultimate aim of achieving 100 percent recycling by 2050. Welsh Government indicate that they will put in place further minimum statutory recycling targets for Local Authorities beyond 2025, potentially at a level of 80 percent by 2033.

The 2021/22 recycling level 59.7 percent and the projected level of 60.7% for 2022/23 are well below the levels required to achieve the 70 percent statutory target by next year (2024-25) and the Authority is at risk of significant fines. Decisions to fine an Authority are considered on its own merits and the Minister for Climate Change, took the decision for the period 2019-20, not to fine Caerphilly, subject to a root and branch review of the services and a commitment to take action.



In July 2023, Cabinet approved a Routemap that outlined a number of priority interventions for the period 2023-25 (Table 2) As demonstrated below some of these interventions are anticipated to increase recycling performance in the short term and have been built upon in the draft waste strategy.

### **How has the data/evidence informed this proposal?**

The results of the survey reflect that the service is of high importance and the public recognise this. This initiative facilitates better performance and supports the financial stability of the authority.

The survey was undertaken during the Covid-19 pandemic, the context has now changed and we are in a different situation now to what we were at the time of the survey.

The data/evidence has shaped the strategy and this proposal in its entirety.

### **Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled? *Details of further consultation can be included in Section 9.***

An external consultant has worked alongside the council to develop a series of behaviour change proposals with the aim of identifying gaps in current levels of understanding amongst the community. This has shaped the communication strategy for this proposal.

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## 9. Consultation

*(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, **The Gunning Principles** must be adhered to. Consider the **Consultation and Engagement Framework**. Please note that this may need to be updated as the proposal develops and to strengthen the assessment.*

**Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.**

We cannot make the proposed changes alone and a collective effort is required. It is important that residents, and our communities have the opportunity to shape proposals. It is proposed that a 12-week consultation period commences in February 2024. A draft Engagement Strategy/draft Consultation Questionnaire have been produced and can be found in Appendix 1 and 2 of the Draft Waste Strategy Report.

The public consultation supporting the council's draft Waste and Recycling Strategy will seek the views of our communities on the proposals within the draft strategy that would assist the council in meeting its outlined objectives.

Particular attention will be paid to those under-represented/seldom heard communities and specifically those identified where the proposals may have a potentially adverse impact upon them through development of the Integrated Impact Assessments for the proposals (e.g. those affected by age and disability are two examples).

Residents will be invited to give their views in a variety of ways including:

- A survey will be available on the council's website [www.caerphilly.gov.uk](http://www.caerphilly.gov.uk). It will be available online and in printed copy. Hard copies will be available from all libraries across the county borough and returned via libraries or through the post.
- A dedicated edition of Newline, delivered to each household within Caerphilly county borough, will also contain a hard copy version of the proposals and associated consultation materials.
- A series of informal face-to-face drop-in sessions for residents will be arranged at venues across the borough. A series of online face-to-face sessions will also be scheduled. As far as possible, these sessions will be held on different days of the week and different times of the day, including early evening, to enable as many people as possible to attend. They will also be planned to coincide with times of highest footfall at individual venues.





- A dedicated meeting of the Viewpoint Panel. The Viewpoint Panel is a group of residents who are regularly invited to get involved in the council's engagement and consultation activities. Anyone who is a resident of the county borough can join.
- Online engagement opportunities through the council's digital engagement platform, Engagement HQ
- Targeted engagement with stakeholders and seldom heard groups – identification of these was supported through the development of in-depth integrated impact assessments (IIAs) for the draft proposals.
- A far-reaching communications campaign will support the consultation by widely promoting the various opportunities for people to have their say including an extensive digital campaign
- Further engagement opportunities to be identified in discussion with local elected members

## **Who was consulted?**

When we talk about engaging our communities and stakeholders we make a commitment to engage, as appropriate, with:

- Residents – people from every part of the county borough and from every community and of all ages, making a particular effort to encourage those not currently engaged/seldom heard
- Community groups and clubs including those on our various panels, community, voluntary and special interest groups
- Users of specific council services
- Vulnerable groups and those with protected characteristics as identified within the Equality Act (2010) and the Public Sector Equality Duty (Wales)
- Children and young people including those on the Youth and Junior Forums
- Employees of the council
- Relevant trade unions



- Business owners/business forums
- Those who visit, work or participate in activities within the county borough
- Our democratically elected representatives
- Town and Community Councils
- Members of the Senedd and Members of Parliament
- Partner organisations
- Welsh Commissioners (Children's, Welsh Language, Older Persons, Future Generations)
- Specific subject forums
- Any other body or group with an interest in the work of the authority and the future wellbeing of the area

An extensive engagement strategy has also been developed to support this proposal.

**When they were consulted did the consultation take place at the formative stage and was adequate time given for consultees to consider and respond?**

Consultation will be carried out in line with the gunning principles at the formative stage.

**Was sufficient information provided to consultees to allow them to make an informed decision on the proposal?**

Consultation will be carried out in line with the gunning principles at the formative stage.

**What were the key findings?**

These will be identified during the period of consultation.



### **How have the consultation findings been taken into account?**

Findings will be analysed and reported back to members and the public. This will enable members to make an informed decision on the basis of what our residents have told us.



## **10. Monitoring and Review**

### **How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?**

Speaking to residents face -to-face allows us to gather information on the demographic profile, allows us to assess age, residential location and other customer information that could also help us to shape and improve the service we provide as well as planning resources to assist those residents who may require special assistance. The proposal could also ultimately help us with planning sustainable waste management initiatives. The information will be provided by the resident either at the door step or via a telephone conversation at a later date if they wish to speak with us via telephone following the visit. This could for example be that they require an assisted collection is they are elderly and/or disabled, require a new/additional food waste caddy etc.

Such monitoring will allow us to target resources and provide bespoke solutions for respective groupings in our communities and help make the waste department become a smarter, more responsive and more citizen focussed service provider. This could mean providing extra support for those persons that are less digitally focussed.

### **What are the practical arrangements for monitoring?**

The overarching aim of the proposal is to improve our services for users, secure the financial stability of the authority, increase recycling/recovery rates and reduce the overall volume of residual waste collected. Recycling figures and recovery tonnages can be monitored based on data captured in Waste Data Flow.

### **How will the results of the monitoring be used to develop future proposals?**

Any monitoring measures that are introduced will be revisited on a regular basis to ensure the implementation is successful or not, as well as capturing any data needed, or improving the service delivery. Data will be captured through Waste Data Flow

Information/data received will be analysed and used to form future commissioning decisions.



**When is the proposal due to be reviewed?**

The proposal will be reviewed on an ongoing basis to ensure the proposals are having the desired effect. Data will be collected through Waste Data Flow.

**Who is responsible for ensuring this happens?**

Rhodri Lloyd

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## 11. Recommendation and Reasoning (delete as applicable)

- Implement proposal with no amendments
- Implement proposal taking account of the mitigating actions outlined
- Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance? (delete as applicable)

- Yes

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## 12. Reason(s) for Recommendations

*(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the "Summary of Integrated Impact Assessment" section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).*

Unsustainable consumption of precious resources and waste disposal has a significant impact on the environment and cannot be decoupled from its impact on our climate. It is important steps are taken to move away from the inefficient linear economy (where resources are taken, made into products, used, and finally thrown away) and transition to a more circular economy. In a circular economy, precious resources are kept in use for longer, maximising material quality and offering social and economic opportunities.

The Draft Waste Strategy, builds upon the previously approved Routemap and sets out the strategic direction to reduce waste and exceed Welsh Government statutory recycling targets.

The Authority is at risk of circa £2m per annum fines for not achieving statutory recycling targets, the Minister previously took the decision not to fine Caerphilly subject to a root and branch review and supplementary actions being implemented to meet future targets. The Draft Waste Strategy sets out how Caerphilly will minimise the negative impacts of waste on the environment by reducing waste, ensuring items are used again, recycled for further manufacturing, or sent for recovery. It builds upon the short- term interventions agreed and part of the Routemap and provides evidence to the Minister of Caerphilly's commitment to make change.

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## 13. Version Control

*(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time) (Add or delete versions as applicable)*

### ➤ Version 1



**Author:- Nicole White**

**Brief description of the amendments/update:-**

**Revision Date:- 15<sup>th</sup> June 2023**

➤ **Version 2**

**Author:- Nicole White**

**Brief description of the amendments/update:- Updated to reflect the draft waste strategy 11/12/23**

**Revision Date:- 7/12/23**

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**Integrated Impact Assessment Author**

**Name:-**

**Job Title:-**

**Date:-**

**Head of Service Approval**

**Name:-**

**Job Title:-**

**Signature:-**

**Date:-**