

HERTFORDSHIRE COUNTY COUNCIL

COMMUNITY SAFETY & WASTE MANAGEMENT CABINET PANEL

FRIDAY 1 JULY 2016 10:00 AM

Agenda Item No.

9

HOUSEHOLD WASTE RECYCLING CENTRE SERVICE

Report of the Chief Executive & Director of Environment

Authors: Mark Simpkins, Waste Manager - Contract Delivery 01992 556175
Matthew King, Head of Waste Management & Environmental Resource
Planning 01992 556207

Executive Member: Richard Thake, Community Safety and Waste Management

1. Purpose of report

- 1.1 To provide the Cabinet Panel with an update on the performance and operation of the Household Waste Recycling Centre (HWRC) service contract, including the introduction of a policy to deal with aggressive and anti-social behaviour at the centres.

2. Summary

- 2.1 The Household Waste Recycling Service (HWRS) handles almost 80,000 tonnes of waste and receives approximately 2.2 million visits per annum. The service provides facilities to segregate up to 33 different materials for recycling, reuse or recovery. Historically the service was managed using a disaggregated approach by having a number of separate contracts for the various elements of the operation. The current contract combines all of these into one agreement with a single service provider.
- 2.2 Amey took over the operation of the county's 17 HWRCs on 6 October 2014 and with the agreement of HCC implemented a number of significant service changes from 5 January 2015. These changes included reduced opening hours and days at 16 of the 17 HWRCs (with the exception of Buntingford).
- 2.3 Other changes introduced included a van permitting scheme in an attempt to better control misuse by businesses and other traders, a commercial waste service trial at their St Albans depot (adjacent to the St Albans HWRC) and the implementation of reuse facilities across the network.
- 2.4 These changes and the new contract delivered annual savings of over £750,000 as well as introducing profit sharing mechanisms and a more robust and thorough approach to performance and contract monitoring with specific remedies for addressing poor performance and driving service improvements.
- 2.5 Amey continues to make improvements to the HWRC network and has been actively carrying out a range of small scale developments across the centres since

the service changes last year. As predicted, user satisfaction levels dipped at the time of the service changes and the busy Easter period that followed but since then steady improvements continue to be made.

3. Recommendation

- 3.1 That the Cabinet Panel consider the content of this report in respect of the HWRC performance and the information on the minor changes to the van permit scheme.
- 3.2 That the Cabinet Panel endorse the adoption of the policy for dealing with aggressive behaviour towards staff, abuse of site rules and fly tipping on or around the HWRCs.

4. Background

- 4.1 Following an extensive procurement process Amey were awarded a contract for the management of the HWRS. As part of their bid, Amey considered a range of available service changes to meet a financial saving target of at least £750,000, which was delivered in full for 2015/16.
- 4.2 The key changes that were agreed were a reduction in the number of days the sites are open and to the operational hours. Appendix A shows the current calendar of agreed opening hours and days.
- 4.3 In addition, Amey also implemented a free van permitting scheme from the 5 January 2015 which generated 22,746 applications up to the end of March 2016.
- 4.4 As anticipated, it took some time for users to become familiar with the new opening times and additional communications were distributed on top of the original communication plan to improve awareness. In addition, site improvements at the Hemel Hempstead and Letchworth HWRCs (signage and parking layout) were made to address specific issues at these sites.
- 4.5 Ongoing communications to raise awareness of the HWRS, including advice on 'how to get the best' from the HWRCs, has appeared in the spring edition of Horizons and local papers. See Appendix B for details of the communication plan for Easter, spring and summer 2016. This campaign is aiming to try and help smooth out the peaks and troughs that the service experiences.

5. Performance

- 5.1 As part of the new contract Amey are responsible for dealing with all customer enquiries and they operate a dedicated call centre to handle queries, applications for free van permits (which are also available on-line) and complaints. The volume of calls handled is shown in figure 1 and table 1 below. These statistics demonstrate that Amey managed very high levels of calls from December 2014 through to April 2015 (just before and after the service changes were introduced), but the information suggests that the number of enquiries is gradually declining. It is important to note that the majority of calls received during this period were

related to applications for van permits and this remains a significant proportion of the total amount of enquires handled by the call centre.

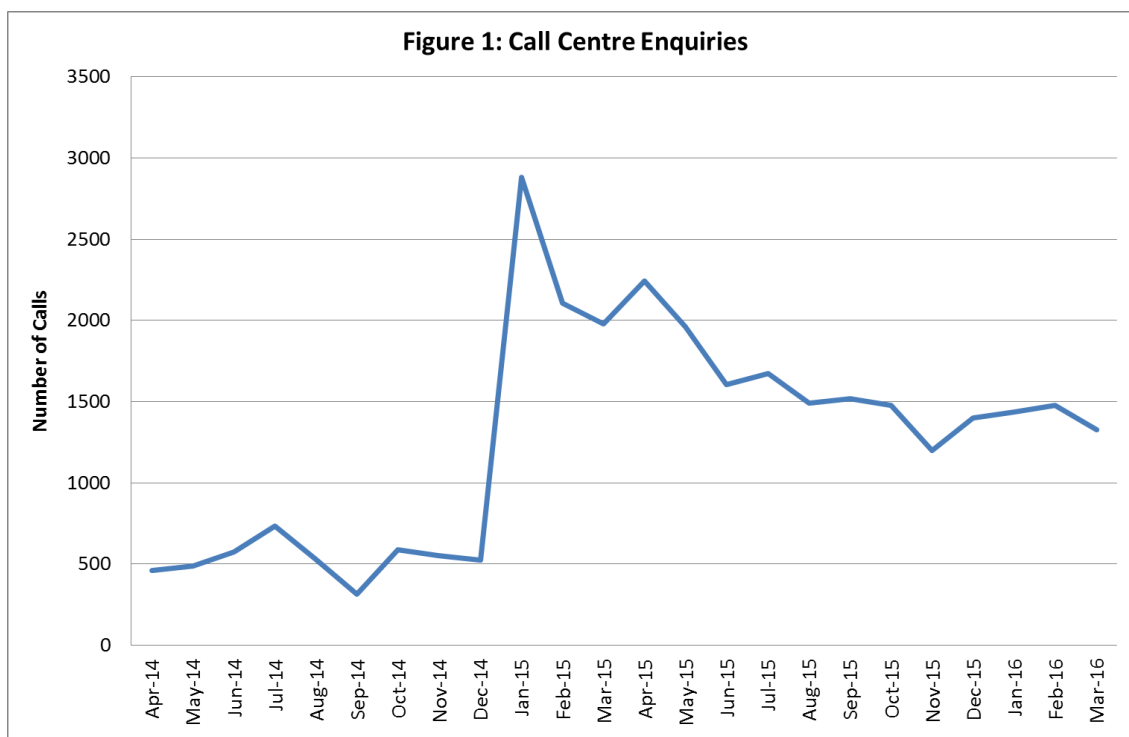


Table 1: Calls regarding the service received by the call centre		
	2014/2015	2015/2016
April	461	2242
May	489	1959
June	572	1606
July	732	1674
August	526	1491
September	315	1518
October	588	1476
November	553	1197
December	524	1398
January	2880	1434
February	2105	1478
March	1978	1327

- 5.2 Table 2 and figure 2 below show the number of complaints received about the service in 2015/16 and table 2 compares these figures with the previous year. This shows that the level of complaints unsurprisingly peaked during the service changes and in the months afterwards (including the busy Easter period), but have since reduced in number, which indicates that the majority of residents are now becoming aware of the changes to the HWRS.

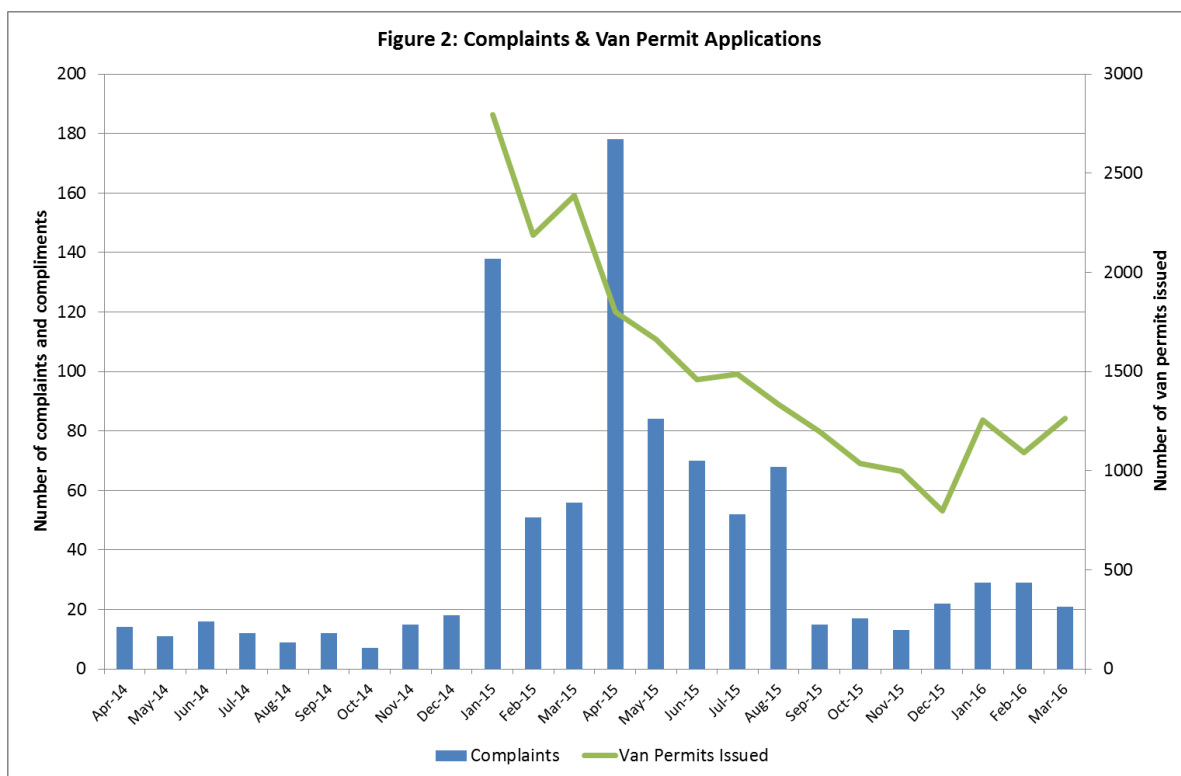


Table 2: Summary of complaints received

	2014/2015	2015/2016
April	14	178
May	11	84
June	16	70
July	12	52
August	9	68
September	12	15
October	7	17
November	15	13
December	18	22
January	138	29
February	51	29
March	56	21
Total	359	598

- 5.3 The van permitting scheme was the subject of 15% of all complaints in 2015/16 from service users who were unaware of, or disagreed with, the implementation of the new scheme. Figure 2 above also shows the number of van permit issued in each month and is detailed further in section 8 of this report.
- 5.4 A summary of the tonnage of materials received at the HWRCs in 2015/16 is shown below in Table 3 with a further detailed breakdown, by site and material, in Appendix C. These demonstrate that Amey have diverted over 72% of all material received from landfill (which is a slight improvement on the previous year).

Table 3 – Tonnage managed through the HWRS

2015/16	Quarter 1 Apr-Jun	Quarter 2 July-Sept	Quarter 3 Oct-Dec	Quarter 4 Jan-Mar	Total
Residual	5,909	5,603	4,781	5,458	21,751
Recycling	13,705	11,384	9,473	10,368	44,930
Composting	2,861	2,708	1,897	1,037	8,503
Reuse	34	28	29	29	120
Recovery	423	1,678	650	480	3,231
Total	22,932	21,401	16,830	17,372	78,535

- 5.5 Table 3 also demonstrates the seasonal fluctuations in user patterns across the HWRS, with greater volumes being received in the first two quarters, which is reflective of how busy the sites are during spring and summer and directly correlates with the number of complaints and enquiries that are received during this period.
- 5.6 An improvement in the way mixed wood wastes were managed from the HWRCs resulted in a significant increase in the amount of material sent for recycling as opposed to energy recovery (through biomass plants). This additional tonnage (circa 13,700 tonnes) has helped increase the projected 2015/16 combined recycling rate for all 11 Hertfordshire Authorities to above 50%.

6. Reuse

- 6.1 The expansion of re-use centres across the network of HWRCs took place during 2015/16, pushing waste up the 'hierarchy' and has proved popular with service users. A proportion of the profits made from the sale of the material are used to incentivise Amey staff to further increase separation of material with the majority being used to offset against the operational costs of the HWRS.
- 6.2 Officers have worked with the national Waste Resources Action Programme (WRAP) and received funded support to examine re-use services elsewhere in the UK. The project outcome suggested that modest investment in signage, pricing, shelving and lighting would provide improvements to the levels of re-use across Hertfordshire and that the provision of a smaller number of purpose built structures, such as that at the Harpenden HWRC (see photograph in figure 3 below), where they can be accommodated, would provide a more comprehensive and effective re-use service across the network. Currently, 16 of the 17 centres have a reuse 'area' but facilities are limited by the availability of space and the need to balance users visiting just to browse or staying longer to browse and the impact this additional parking pressure brings to other service users who simply want to be in and out of the centre as quickly as possible. Further improvements are being investigated to create larger shops at certain HWRCs that can accommodate them and officers and Amey are also looking into working with other partners such as other reuse organisations and charities.

Figure 3: The Harpenden HWRC re-use centre



7. Unscheduled closures

- 7.1 Wherever possible the council's haulier schedules their collections to be carried out on the closure days or outside operational hours. However, servicing during opening hours, resulting in a temporary closure while containers are safely exchanged is sometimes unavoidable as containers can fill up more quickly than anticipated and require emptying to keep the sites open or maintain capacity for certain materials, especially during busy times.
- 7.2 To provide further information, Table 4 demonstrates a comparison of the level of servicing undertaken during operational and non-operational hours in August 2014 and August 2015. This shows a significant improvement across the entire network in terms of servicing outside of published opening times from 22% in 2014 to 68% in 2015.

Table 4: Servicing of HWRCs

Household Waste Recycling Centres
Number of Waste Stream Movements (Full Containers)
Weeks 19 to 22 (August) - All Off Takers

	2014				2015			
Site	Collections made when open to the public	Collections made when closed to the public	TOTAL Collections	% Serving Undertaken when site closed	Collections made when open to the public	Collections made when closed to the public	TOTAL Collections	% Serving Undertaken when site closed
Berkhamsted	47	13	60	21.67%	24	36	60	60.00%
Bishops Stortford	82	52	134	38.81%	28	89	117	76.07%
Buntingford	10	27	37	72.97%	0	35	35	100.00%
Cole Green	100	6	106	5.66%	27	56	83	67.47%
Elstree	97	6	103	5.83%	47	37	84	44.05%
Harpenden	97	50	147	34.01%	47	82	129	63.57%
Hemel Hempstead	166	26	192	13.54%	49	96	145	66.21%
Hoddesdon	59	17	76	22.37%	12	55	67	82.09%
Letchworth	86	80	166	48.19%	19	132	151	87.42%
Potters Bar	109	20	129	15.50%	40	79	119	66.39%
Rickmansworth	155	42	197	21.32%	44	117	161	72.67%
Royston	80	24	104	23.08%	28	42	70	60.00%
St Albans*	161	15	176	8.52%	66	112	178	62.92%
Stevenage	171	47	218	21.56%	53	157	210	74.76%
Turnford	129	17	146	11.64%	50	64	114	56.14%
Ware	77	46	123	37.40%	22	89	111	80.18%
Waterdale*	196	33	229	14.41%	102	107	209	51.20%
TOTALS	1822	521	2343	22.24%	658	1385	2043	67.79%

* Split Level Sites – Container collections made during published opening times do not necessarily result in site closure.

- 7.3 Table 5 below shows a comparison of full site closures in 2014/15 and 2015/16, that is, the number of occasions where sites were unable to receive any waste and were forced to close for a significant proportion of the day. This highlights that since Amey have taken over there has been a significant improvement in terms of facility availability and that, permanent closures, due to a total lack of capacity for waste, is more likely to occur during the busier spring and summer periods.

Table 5 – Full HWRC closure

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
2014/15	8	3	5	0	0	1	0	0	0	0	0	0	17
2015/16	2	0	0	0	0	0	0	0	0	0	0	0	2

- 7.4 To help achieve this significant improvement in performance Amey and the contracted haulier have been working together to prevent as many temporary closures and capacity issues by ensuring effective communication and maximising the weight of material in the containers. To help with this and also focus on improved customer services, Amey implemented an incentive scheme with their staff in October 2015.
- 7.5 The council's contract with its contracted haulier expires at the end of June 2016, after which time, the services for container movement, haulage and maintenance of the Council's containers will move to Amey, which is included in their overall management fee.

8. Van Permitting Scheme

- 8.1 The free van permitting scheme allows 12 visits to any Hertfordshire HWRC for those that use a van, pick-up or trailer to dispose of their household waste. Since implementation of the scheme on 5 January 2015, Amey have processed 22,746 permit applications until the end of March 2016, which includes 1,877 reapplications. This figure amounts to 9% of the total issued and implies that the vast majority of holders, have not yet used up their 12 visits.
- 8.2 Amey have identified that there are certain individuals who have been attempting to abuse the system and as a result of follow up investigations, they have tightened up controls on the scheme including the following changes:
- Wording has been simplified in order to provide one clear message and also explains that limits apply to construction, excavation and demolition wastes in line with existing policy for all other users.
 - Key messages have been highlighted to ensure that there is no confusion when residents arrive at the site.
 - Amey will stamp all permits at the point of issue to prevent copying.
 - The recording system that site managers complete has been revised to allow better monitoring of genuine usage of the permits and track previous waste types brought in.

- 8.3 Amey has also conducted some research into the geographical origin of the van permit applications received to the end of February 2016. The information shows that circa 90% of applications have come from Hertfordshire residents and the remainder originate from surrounding counties, London Boroughs or individuals that are seeking to assist relatives who live in Hertfordshire in disposing of their waste.

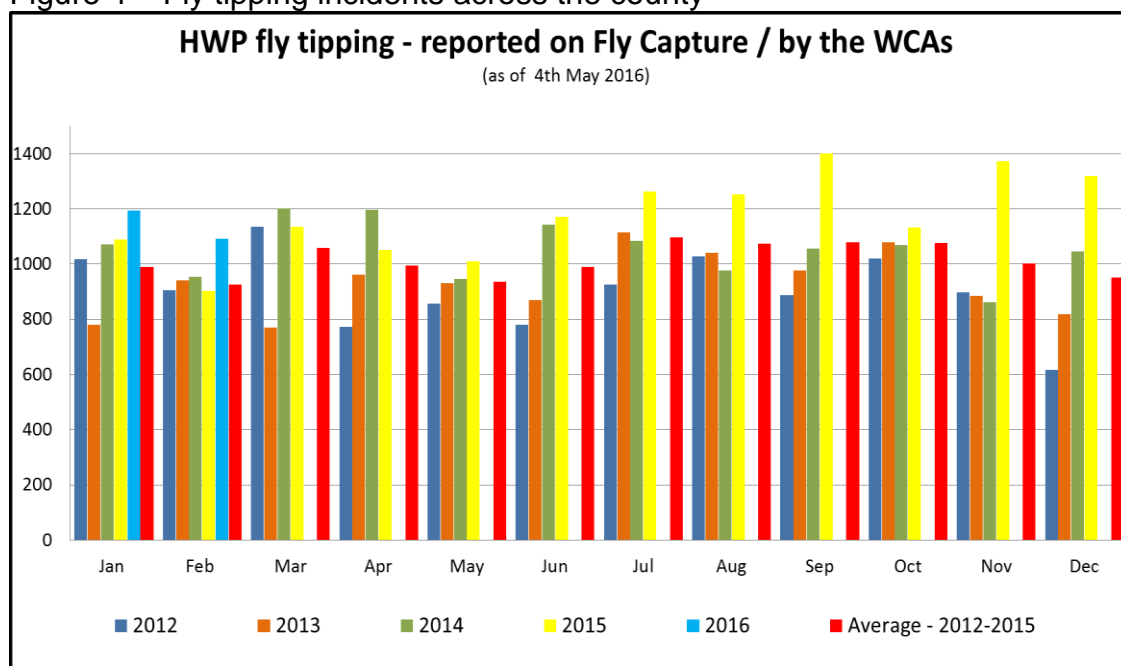
9. Commercial Waste trial

- 9.1 As part of the HCC contract requirements Amey established a pilot commercial waste service at their St Albans depot in September 2015 to allow traders and commercial organisations to legitimately pay to dispose of their waste. Uptake of the service has been disappointing with only 28 users in 2015/16 and a total net cost to Amey of circa £10,000.
- 9.2 Amey have recently notified the Council that they were unsuccessful in bidding for the waste collection contract for St Albans City and District Council, which means that they will no longer be able to occupy the depot from 13 June 2016. As a result, Amey are looking at an alternative solution, which is likely to suggest the provision of commercial waste services at some of the larger HWRCs (which already exists at the Waterdale Transfer Station).

10. Fly Tipping

- 10.1 Fly tipping at the gates of the centres on closure days has remained minimal and any items are cleared by Amey before the sites reopen in accordance with the contract. The Environment Agency's Flycapture system, no longer exists and this has recently been incorporated into the National Waste Data Flow reporting process. Figure 4 details the number of fly tipping incidents reported by Hertfordshire's Borough and District Councils up until 4 May 2016.

Figure 4 – Fly tipping incidents across the county



- 10.2 Although the data indicates that the number of recorded fly tipping incidents is on the increase (as it is nationally), there is not any demonstrable link between the changes in operation across the HWRS and the level of fly-tipping incidents.
- 10.3 Officers have been working closely with the Hertfordshire Fly Tipping Group, which includes the Borough and District Councils and Hertfordshire Constabulary to improve enforcement opportunities against those responsible for fly tipping waste. The issue has also been escalated to the Hertfordshire Waste Partnership (HWP) and it has been agreed that the HWP will oversee the work of the group to ensure a consistent approach is being taken across the county.

11. Aggressive and Anti-social Behaviour Policy

- 11.1 Amey has reported a 26% increase in the number of occasions where HWRC operatives have been subjected to harassment, the threat of physical harm or sustained verbal abuse by a service user; 2014 (65 incidents) and 2015 (82 incidents). Their findings for the Hertfordshire HWRS mirror an increase in incidents on other similar contracts they hold within the UK, such as in Peterborough and central Bedfordshire. This has led Amey to adopt a policy of zero tolerance on violence or abuse in the workplace.
- 11.2 The occasions when aggressive behaviour has necessitated police involvement has also increased, from 11 occasions in 2014 to 18 in 2015. Recognising that the inappropriate behaviour of service users (and operators) is unacceptable, a suitable and robust policy has been developed to try to address the problem. This has been informed by working with other authorities who have an established policy already and Hertfordshire Police to ensure the policy is fit for purpose.
- 11.3 The full policy is shown in Appendix D.

12. Contract monitoring

- 12.1 To seek improvement and monitor Amey's performance officers are able to issue action plans and have been conducting frequent visits to the HWRCs to ensure that the sites are running efficiently and that Amey are delivering the Key Performance Indicators (KPIs) and other service requirements as set out in the contract.
- 12.2 Monthly contract meetings are held to monitor progress against all aspects of the contract and where necessary officers have used this to escalate issues and explore potential solutions and future improvements to the HWRS. The contract uses a payment mechanism which includes a performance measurement framework. This framework assesses Amey's performance on various aspects of the contract and is directly linked to their overall payment for the operation of the centres; a "performance by results" approach based on the KPIs.
- 12.3 Mystery shopping forms a part of this measurement framework. This involves representatives from the Council and Amey, who are not linked to the contract, carrying out visits where they follow a set list of questions to assess the quality of the service being provided at the centres. To date, all mystery shopping visits

have provided positive feedback and Amey have scored an average satisfaction level of 80%.

13. Customer Satisfaction

13.1 In November 2015, Amey commissioned MEL Research to carry out an HWRC User Survey to identify who is using the centres and also monitor customer satisfaction. Ten of the seventeen sites were surveyed and 1,300 site users were asked for their views.

13.2 The key results and findings for the 2015 User Survey are as follows:

- 93% of those surveyed were satisfied with the cleanliness of the site.
- 98% of those surveyed could identify the presence of site staff.
- 81% of those surveyed said staffs were helpful.
- 82% of those surveyed were satisfied with the site layout.

13.3 Appendix E provides full details of the survey.

14. Added Value

14.1 Amey's bid included a number of provisions for added value to the service in terms of waste education and community involvement.

14.2 Amey's staff are allocated a number of hours each to work on volunteer days and/or community projects each year. Amey have made contact with the Council's Countryside Management Services who are keen to work with them and are arranging to make a number of their staff available for some of their volunteer days.

14.3 Through the Council's Work Solutions team, to date, three candidates have enjoyed work tasters at Hertfordshire's Household Waste Recycling Centres and following a successful meeting with Amey, these opportunities are set to expand further.

14.4 Amey's Supplier Diversity Charter supports and encourages micro and small and medium enterprises in Hertfordshire to join their supply chain.

14.5 As part of the contract a dedicated waste education 'outreach' officer from Amey undertook 31 waste education visits during 2015/16 by. These consisted of:-

- 3 visits to the Waste Facility at Waterbeach in Cambridgeshire to view their MRF (Materials Recycling Facility), MBT (Mechanical Biological Treatment) and IVC (In-Vessel Composting) treatment plants.
- 27 visits to Hertfordshire schools (mainly primary)
- 1 visit to a Hertfordshire community group

In total 5,283 Hertfordshire children and 345 Hertfordshire adults have been visited by Amey's waste education officer to talk about the importance of reducing

waste and how to recycle and compost at home, as well as reusing and repairing where possible.

15. Financial Implications

15.1 None arising from this report.

16. Legal Implications

16.1 Officers have worked with Legal Services to ensure that the aggressive and anti-social behaviour policy is consistent with relevant legislation.

17. Equalities Implications

- 17.1 When considering proposals placed before Members it is important that they are fully aware of, and have themselves considered the equality implications of the decision that they are making.
- 17.2 Rigorous consideration will ensure the proper appreciation of any potential impact of that decision on the Council's statutory obligations under the Public Sector Equality Duty. As a minimum this requires decision makers to read and carefully consider the content of any Equalities Impact Assessment (EqIA) produced by officers.
- 17.3 The Equality Act 2010 requires the Council when exercising its functions to have due regard to the need to (a) eliminate discrimination, harassment, victimisation and other conduct prohibited under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics under the Equality Act 2010 are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief, sex and sexual orientation.
- 17.4 For completeness the EqIA on the proposed aggressive and anti-social behaviour policy is included in Appendix F. This takes into consideration the potential impact the suggested proposals will have on service users and officers have worked with the Equality and Diversity Team to ensure that issues that may arise are capable of mitigation.

18. Background papers

Highways & Waste Management Cabinet Panel:	Date
Household Waste Recycling Centres – Procurement of a New Service	18.09.2014
Waste Management Cabinet Panel:	Date
Information Note 14/09: Household Waste Recycling Centres – Procurement of a New Service	22.08.2014
Household Waste Recycling Centres – Procurement of a New Service	08.07.2014
Household Waste Recycling Centres – Procurement of a Service	18.03.2014

Household Waste Recycling Centres – Procurement of a New Service	06.11.2012
Household Waste Recycling Centres – Procurement of a New Service	05.07.2012
The Right Level Of Publicly Financed Services (Household Waste Recycling Centres)	01.03.2012
Council For The Future - The Right Level Of Publicly Financed Services	16.11.2011
The Right Level Of Publicly Financed Services (Household Waste Recycling Centres)	06.07.2011
Council For The Future - The Right Level Of Publicly Financed Services:	16.11.2010
Waste Management	

Appendices

Appendix A: Summary of current opening times

Appendix B: Communications plan

Appendix C: HWRC tonnage breakdown

Appendix D: Aggressive and anti-social Behaviour Policy

Appendix E: Customer satisfaction survey

Appendix F: Equality Impact Assessment

Appendix A – Summary of Current Opening Times

	CALENDAR OF OPENING DAYS							New hours from 05 January 2015
	M	T	W	T	F	S	S	
Berkhamsted								All Year 08.30 - 16.30
Hemel Hempstead								Summer 10.00 - 18.00
								Winter 08.00 - 16.00
Rickmansworth								All Year 10.00 - 18.00
Waterdale								All Year 10.00 - 18.00
								Saturdays (Summer only) 08:00 - 18:00
St Albans								Summer 10.00 - 18.00
								Winter 08.00 - 16.00
Harpenden								All Year 10.00 - 18.00
Turnford								All Year 10.00 - 18.00
Hoddesdon								All Year 10.00 - 18.00
Ware								Summer 10.00 - 18.00
								Winter 08.00 - 16.00
Bishop's Stortford								All Year 08.00 - 16.00
Royston								All Year 08.00 - 16.00
Letchworth								All Year 10.00 - 18.00
Stevenage								All Year 10.00 - 18.00
								Saturdays (Summer only) 08:00 - 18:00
Cole Green								Summer 10.00 - 18.00
								Winter 08.00 - 16.00
Elstree								Mon - Fri 08.00 - 16.00
								Sat - Sun 09.00 - 17.00
Potters Bar								Summer 10.00 - 18.00
								Winter 08.00 - 16.00
Buntingford								Mon - Fri 17.00 - 20.00
								Sat - Sun 10.00 - 13.00
Key:		Days Closed						
		Days Open						

Appendix B – Communications Plan

EASTER, SPRING & SUMMER 2016 COMMUNICATIONS PLAN
<p>Objectives</p> <ul style="list-style-type: none"> • To raise awareness of HCC's additional day of opening • To provide reassurance about availability of service • To promote tips for a stress-free visit • To discourage visits at the busiest times • To encourage residents to make the most of kerbside recycling • To protect Hertfordshire County Council's reputation
<p>Implementation</p> <ul style="list-style-type: none"> • To issue press releases ahead of Easter and the May Bank Holidays • To schedule regular and frequent social media messages in line with press releases • To incorporate good stories around school electrical collections (14-18 March) • To lead activity into communications around countywide WEEE Stop events (9 April-30 July)
<p>Summary of Easter activity</p> <p>Week commencing 7 March Focus: Waste Week – tie in with WasteAware team. Social media messaging: encourage kerbside recycling; publicise additional Good Friday opening; identify school for WEEE collection event & invite media.</p> <p>Week commencing 14 March Focus: School WEEE events – live coverage; weave in social media messages to encourage kerbside recycling; publicise additional Good Friday opening; and tips for stress-free trips to the tip.</p> <p>Week commencing 21 March Focus: review of schools collections and ramp up messages about Easter trips to the HWRC: encourage kerbside recycling; publicise additional Good Friday opening; and promote tips for stress-free trips to the tip.</p> <p>Week commencing 28 March Focus: publicise WEEE Stop collections with call to action to clear out and prepare to responsibly dispose of old electrical items.</p> <p>Summary of summer activity</p> <p>Ongoing May - August Focus: promoting HWRCs as for exceptional visits and what the various alternatives are in order to reduce the overall amount of waste taken to them. Stress-free tips about avoiding the busiest times including, pre-sorting waste etc.</p>
<p>Audiences</p> <ul style="list-style-type: none"> • Residents • HWRC employees • Councillors (district, borough and county) • District, Borough and Parish councils • Known users of the centre • Community groups • Local media

Appendix C – 2015/16 HWRC Tonnage Breakdown by site and material

Household Waste Recycling Centres																												Recycled	Reuse Shops	Recovered	Residual Waste	All Waste	Recycled	Landfill Diversion		
	Recycled/Recovered																											Total	Total	Total	Total	Total	% of Total	% of Total		
	Green Waste	Cardboard	Wood Recycled	Wood Recovered	Glass	Paper	Metal	Non Ferrous Metal	Fridges	TVs	Small Electrical Items	Large Electrical Items	Fluro Tubes	Textiles	Rigid Plastics	Tyres	Car Batteries	Household Batteries	Oil	Cooking Oil	Electrical Reuse	Reuse	Plaster	Toner	CD	Phone	Cans, plastics & tetrapaks	Hardcore & Rubble	Books	Total	Total	Total	Total	Total	% of Total	% of Total
	Tonnes	Tonnes	Tonnes		Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes	%
Huddesdon	211.7	101.1	456.19	107.6	14.6	33.6	167.3	8.7	26.6	26.9	94.7		0.3	33.2	55.5	4.8	4.9	1.2	3.4	0.4		1.3	28.0	0.3	0.9	0.0	14.5	317.5	4.7	1,612.3	1.3	107.6	677.8	2,397.7	67.3%	71.78%
Turnford	396.0	192.4	961.57	226.7	33.0	75.4	359.5	10.3	55.9	49.7	190.3	39.7	0.6	69.0	150.1	8.4	7.6	0.9	9.4	2.1		1.3	60.3	0.3	1.6	0.0	24.2	824.1	1.5	3,525.0	1.3	226.7	1,600.8	5,352.5	65.9%	70.12%
Berkhamsted	498.3	136.3	391.21	92.2	22.6	58.7	208.6	8.0	27.8	36.6	98.1	30.1	0.5	54.0	45.6	7.0	3.4	1.0	2.3	0.4		1.3	15.6	0.3	1.0	0.0	2.9	332.6	4.3	1,988.8	1.3	92.2	666.9	2,748.0	72.4%	75.78%
Hemel Hempstead	463.0	229.1	964.99	227.6	10.6	49.7	381.6	4.9	63.0	59.6	190.8	64.0	0.7	68.0	82.5	12.8	6.3	1.2	8.5	0.9		2.4	55.4	0.2	0.9	0.0	2.7	737.6	3.0	3,464.3	2.4	227.6	1,409.5	5,101.4	68.0%	72.42%
Buntingford	102.4	35.1	113.40	26.7		5.8	104.3	3.0	13.6	10.7	2.3		0.1	8.8		2.1	1.3	0.5	1.0					0.1	0.1	0.0	45.4	58.8		508.8	-	26.7	236.2	771.7	65.9%	69.39%
Bishop's Stortford	736.9	246.2	730.12	172.2	40.0	77.6	320.9	1.2	45.6	56.7	192.6	45.5	0.5	61.8	57.2	9.0	9.1	2.3	5.7	1.1		3.6	37.3	0.2	0.9	0.1	6.1	576.9	5.0	3,269.9	3.6	172.2	1,355.0	4,797.1	68.2%	71.83%
Ware	381.4	236.6	711.66	167.8	24.5	62.7	239.8	0.9	38.5	28.4	133.6	38.9	0.5	59.9	86.3	7.5		0.5	6.9	1.3		0.7	48.8	0.3	1.1	0.1	7.9	513.0		2,631.7	0.7	167.8	1,245.8	4,045.4	65.1%	69.22%
Elstree	232.3	179.5	658.15	155.2	11.6	89.7	241.6	1.6	35.4	36.3	106.0	36.0	0.6	42.2	66.1	5.8	3.4	1.9	3.7	0.9		1.4	30.4	0.3	1.2	0.1	7.7	393.5		2,187.4	1.4	155.2	944.2	3,286.8	66.6%	71.31%
Potters Bar	447.0	170.2	673.08	158.7	14.9	67.0	292.3	0.8	37.7	37.8	85.5	23.1	0.8	51.4	100.1	5.9	1.8	2.0	5.9	1.2		0.9	31.3	0.3	0.8	0.0	11.2	526.6	4.4	2,594.0	0.9	158.7	1,266.9	4,019.5	64.6%	68.50%
Leitchworth	756.0	313.8	1,174.50	277.0	41.5	112.2	463.3	14.7	78.8	77.2	234.7	84.1	0.8	82.6	146.0	12.6	6.9	1.6	8.3	1.9		1.8	63.4	0.4	0.9	0.0	11.5	875.9		4,565.5	1.8	277.0	1,531.8	6,374.2	71.7%	76.00%
Royston	445.3	177.1	428.30	101.0	18.8	81.4	214.7	5.7	32.7	35.7	120.6	51.2	0.5	57.4	63.4	8.4	1.9	1.8	5.1	0.6		1.4	28.5	0.3	1.2	0.0	15.2	392.0	6.9	2,196.2	1.4	101.0	660.9	2,958.1	74.3%	77.70%
St. Albans	718.3	342.4	996.47	235.0	39.7	140.8	396.9	8.9	61.0	66.2	190.9	79.9	1.3	94.5	140.1	9.5	4.5	1.6	5.7	0.7		8.0	41.9	0.5	2.1	0.2	24.5	725.5	3.9	4,105.9	8.0	235.0	1,450.1	5,791.0	71.0%	75.10%
Harpenden	676.8	262.3	557.97	131.6	63.0	125.2	264.7	5.2	34.1	42.8	162.9	43.9	0.9	78.6	90.7	8.7	7.1	3.3	3.9	0.7	1.7	25.7	29.0	0.6	1.8	0.1	26.7	571.5	18.4	3,108.4	27.4	131.6	934.8	4,174.8	75.1%	78.27%
Stevenage	729.1	452.5	1,721.26	405.9	48.6	155.3	623.2	9.7	105.9	112.6	338.3	106.7	1.3	140.6	241.5	15.7	17.6	6.0	13.8	2.0		8.2	82.7	0.7	2.2	0.1	35.4	1,397.6	12.4	6,380.7	8.2	405.9	2,630.6	9,417.2	67.8%	72.15%
Rickmansworth	524.1	203.4	968.89	228.5	28.3	83.7	336.7	5.1	53.3	50.6	166.4	76.1	1.1	99.0	91.4	5.5	6.9	2.8	7.1	1.6		6.1	37.1	0.3	0.9	0.1	6.0	703.8	3.6	3,469.7	6.1	228.5	2,116.6	5,814.8	59.8%	63.70%
Waterdale	831.5	296.4	1,484.34	350.0	31.2	110.6	508.5	2.9	93.0	83.3	252.1	112.0	1.1	126.1	184.1	14.1	12.6	3.1	11.6	1.1		7.4	93.6	0.6	2.1	0.1	14.2	1,099.2	5.5	5,382.3	7.4	350.0	2,186.7	7,919.0	68.1%	72.48%
Cole Green	353.5	178.8	713.67	168.3		32.1	246.3		41.2	38.6	125.3	29.9	0.3	39.9	85.3	7.5	1.8	0.4	7.7	0.3		1.6	34.5	0.2		0.0	7.4	448.8	1.5	2,396.7	1.6	168.3	823.5	3,388.6	70.8%	75.74%
Misc HWRC																					44.3								44.3	44.3	-	14.1	58.4	N/A	N/A	
	8,503.7	3,753.1	13,705.8	3,231.9	443.0	1,361.3	5,370.1	91.7	844.1	849.7	2,685.2	860.9	12.0	1,167.0	1,685.9	145.2	97.1	32.1	109.9	17.1	1.7	117.3	718.0	6.0	19.8	0.9	263.4	10,494.9	75.2	53,432.1	119.0	3,231.9	21,752.2	78,535.2	68.2%	72.30%

Notes:

- 1) All figures are subject to final reconciliation
- 2) 44.3t Miscellaneous Reuse tonnage not allocated on a site specific basis until October 2015
- 3) 14.1t of Residual Waste not allocated to a specific site due to waste analysis work

**Enforcement guidance for the management of
the Household Waste Recycling Centres
(HWRCs) in
Hertfordshire**



working in
partnership with



Implementation date: T.B.C.

Original Author: Alice Henderson, Waste Senior Technical Officer, East Sussex Council – with thanks

Editor: Linda Whitehead, Senior Projects Officer, Waste Management Unit, Hertfordshire County Council

Version 1

Review every 2 years.

Updates: as required by changes to guidance or arrangements.

Background

Hertfordshire County Council (HCC) and AmeyCespa (East) Limited (Amey) have entered a contract for the provision of a Household Waste Recycling Service (HWRS) until 5 March 2023 unless terminated or extended in accordance with the provision of the contract.

HCC have a statutory requirement to provide Household Waste Recycling Centres (HWRCs) for residents to deposit their own household waste, which is set out in the Environmental Protection Act 1990 (EPA 1990 - part 2, 51 1b). One aspect of the contract is the management of the 17 HWRCs across the county.

This guidance sets out the main responsibilities in the management of enforcement issues. Due to the nature of the sites, enforcement issues include:

- trade waste – where a person deposits, or attempts to deposit, trade waste at the site
- fly-tipping – where a person illegally dumps waste near or on the site
- staff abuse – where a member of staff is subjected to harassment; physical harm or verbal abuse by a site user
- site policy abuse – where a person disregards site management policy

This document sets out the principle of enforcement as agreed by the Head of Waste Management on T.B.C. and reviewed at 2 yearly intervals.

Enforcement responsibilities

Due to the different legislation in place Amey and HCC will work together to enable successful enforcement action to be taken.

- Trade and fly-tipping abuse: relates to the [Environmental Protection Act 1990](#) and therefore enforcement action will be taken by the local authority, with Amey collating and storing original evidence. These will be held in a safe and secure manner and in full accordance with the Data Protection Act and Freedom of Information Act.
- Staff abuse and site policy abuse: Amey will take enforcement action as the employer or site operator; however HCC will provide assistance where required obtaining vehicle keeper details from the Driver Vehicle and Licensing Agency (**DVLA**), as Amey has no authority to request this. Staff should continue to report all health and safety issues as normal to their employer via Amey's AIRSWEB reporting system.

A more accurate breakdown of who will take what action has been agreed between HCC and Amey.

Enforcement options

Where action is required a formal decision may need to be made on a case-by-case basis to ensure that the public interest is accounted for as well as having evidence to take action. In all cases the priority will be to resolve the situation, rectify any problems and recoup any losses to the council. Options of enforcement range from:

1. Issue a warning letter setting out the concerns of the organisation, and the relevant legislation/policies.
2. Invoices issued: to seek to recover disposal costs incurred from illegal waste disposal.
3. Debt recovery. This action can be taken where the cost of waste removal remains unpaid by the offender and may be preferable to formal proceedings. In all cases it will be important to ensure that proof of illegal disposal is clear.
4. Restricting access: this could range from restriction of the site/time/day of access to a time limited ban from all sites.
5. Legal action: Caution, Injunction, Criminal Behaviour Order, Prosecution.

Appendix 1 sets out the procedures for taking action, ranging from the recording of incidents through to police involvement. If the Police are unable to act consideration should be given to seeking other routes for protection such as warnings site ban (with or without a court order). A ban requiring a court order will be applied for and issued by the Council, and if not complied with, enforced by civil action by the local authority applying for a Criminal Behaviour Order.

An injunction may be obtained in a number of ways, including trespass to land where they have been banned or where a warning has been given (verbally or in writing) that breaching rules will lead to them being banned. Before any formal action is taken agreement will be sought with HCC and all other steps will have taken such as time limited ban which can be made by the Contract Manager or Assistant Operations Manager representing Amey. The final decision will sit with HCC, will never be taken lightly and may not be permanent.

The Contract Manager and Assistant Operations Manager representing Amey have the authority to issue all other types of warning letters. Examples are shown in appendix 2.

It should be noted residents or other site users should expect the site operative to be polite, courteous, helpful and professional at all times. In the event that this is not the case, this should be reported to Amey as a complaint and they will then carry out an investigation into the incident

Legal framework

This section sets out the legal framework under which enforcement action can be taken. The framework and relevant legislation is summarised below with full details contained in appendix 3 A more detailed breakdown of procedures in place has been agreed. Where action is required, a formal decision may be need to be made on a case-by-case basis to ensure that public interest is accounted for as well as having evidence to take action.

Trade Waste Abuse

The deposit of trade waste at a HWRC is deemed illegal under sections 33 and 34 of the EPA 1990¹. Trade waste abuse will most commonly come in the form of a trader trying to access the site and leave their waste (either knowingly breaking the regulation or not). However, it is also inevitable that in some cases trade waste will be identified on-site after the event. Amey and

HCC will work together to ensure trade waste is not accepted at the site wherever possible.

Householders also have a duty of care to check that anyone they use to take away and dispose of their domestic waste is registered. Householders are not required to supply duty of care documentation, such as a waste transfer note, but they could face a maximum fine of £5,000 if they fail to take reasonable measures to ensure their domestic waste is handled by an authorised waste carrier. It is for the court to determine whether or not 'reasonable measures' were taken in a particular case (section 34(2)).

Fly-tipping

As the HWRCs receive waste they are sometimes subject to incidents where waste is deposited locally, but not on-site or in the containers (i.e. at the site entrance or on the access road). This may or may not be within operating hours (e.g. due to being turned away, the site being closed to change a container, or on a scheduled closure day).

The deposit of waste not in accordance with the licence (i.e. fly-tipped) is illegal under section 33 and 34 of the EPA 1990¹.

In all cases the priority will be to resolve the situation, rectify any problems and recoup any losses to the council.

Staff and Site Policy Abuse

The HWRCs have on-site staffs, employed directly by Amey, and from time to time additional (e.g. agency staff) who are responsible for the smooth and successful operation of the sites. Other staff that could be on-site include:

- HCC officers visiting the site (usually for monitoring but also for meetings)
- Amey management staff to monitor the sites and manage the staff on-site
- Amey haulage staff changing containers.

All staffs are expected to be able to work in safe conditions and experience no harassment, verbal or physical abuse, as set out in the Health and Safety at Work etc. Act 1974. Harassment is unwanted or unjustified behaviour which affects the dignity of anyone in the workplace, and which the recipient finds threatening, demeaning or offensive.

The safety of staff is paramount and the first action will be to take any health and safety actions as necessary (i.e. administer first aid, complete an incident book entry, report on AIRSWEB call the police).

Evidence management

With the prospect of prosecution in mind evidence must be managed appropriately. Where any formal record is taken by Amey (such as CCTV or ANPR records, still photos or incident reports) they will:

- Be noted and held in a safe and secure manner in full accordance with the Data Protection Act, Freedom of Information Act and Police and Criminal Evidence Act.
- Be copied, labelled and the original stored in a locked container or room at one of Amey's offices. The copy will be handed to HCC's Waste Management Unit – Contract Delivery Team by Amey's HWRS Contract Manager.

- Be accompanied by a statement detailing who has created the exhibit, why and how. This will include a brief description of the officer's responsibilities in relation to the exhibit.

See Notes on Evidence Gathering and Notes on Making a Statement in appendix 4. Each organisation is responsible for ensuring their internal controls and processes are up to date and that staff are fully trained.

It is imperative that the appropriate steps are taken to enable prosecution at a later date if necessary.

Reporting and monitoring

Monthly Contract Meetings are held between Amey and the Waste Management Unit – Contract Delivery Team. At these meetings any enforcement action will be discussed, any bans will be reviewed on a regular basis in accordance with the terms of the ban as notified to the member of the public.

In all cases where a letter has been issued a comprehensive summary will be held detailing the background to the matter, steps taken and available evidence. This will ensure transparency of operations and enable HCC to investigate if any complaints are received. The summary will include electronic copies of correspondence relating to the case.

Complaints

As the operator responsible for the HWRS, all complaints will be handled by Amey, who can be contacted as follows:

Amey
Customer Services Centre
Herts HWRC Team
The Matchworks
142 Speke Road
Liverpool
L19 2 PH
Amey's Customer Helpline. 0300 123 4051 Option 1.
Email. hertshwracs@amey.com

Where someone wishes to complain about Amey's management or conduct, HCC should be contacted using the following details:

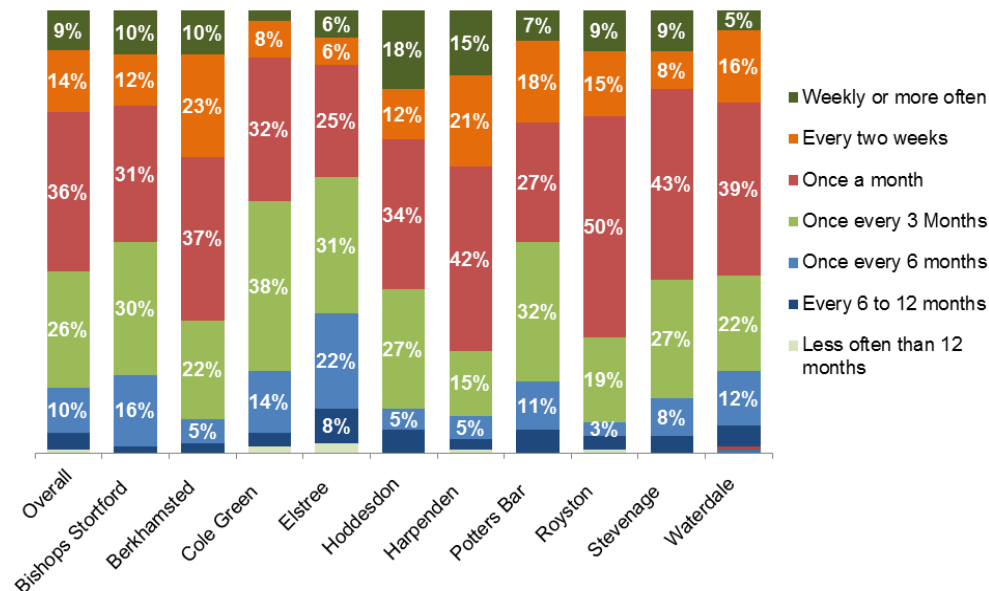
Hertfordshire County Council
Waste Management Unit
Postal Point CHN106
County Hall
Pegs Lane
Hertford
SG13 8DN

Tel: 01992 556182
Email: wasteaware@hertfordshire.gov.uk

Appendix E - Customer Satisfaction Survey Results

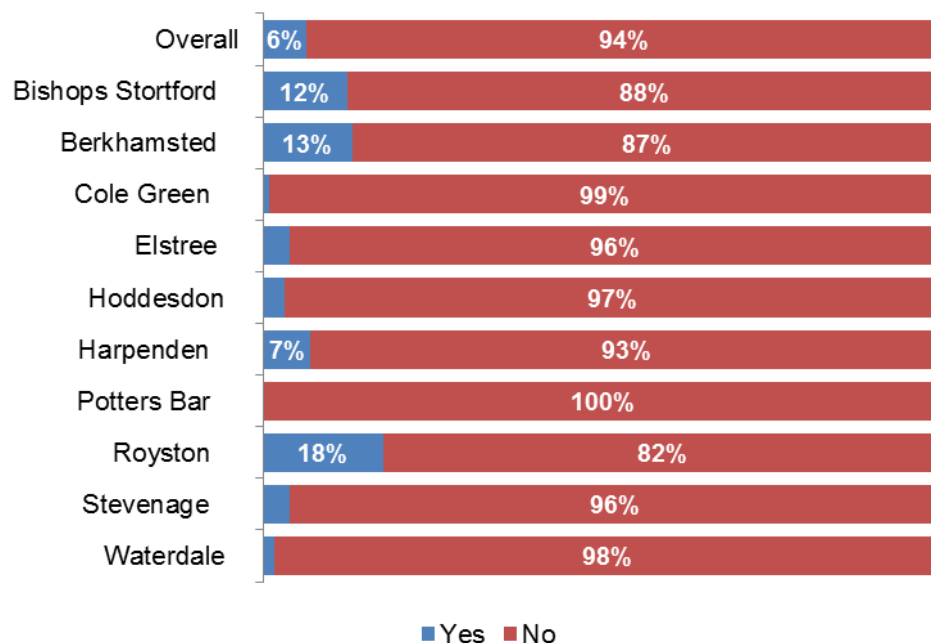
Respondents were asked how often they visit a Hertfordshire HWRC; users visiting at least once a month were highest at the Harpenden (77%), Royston (74%) and Berkhamsted (70%) sites.

How often do you visit a Hertfordshire HWRC?

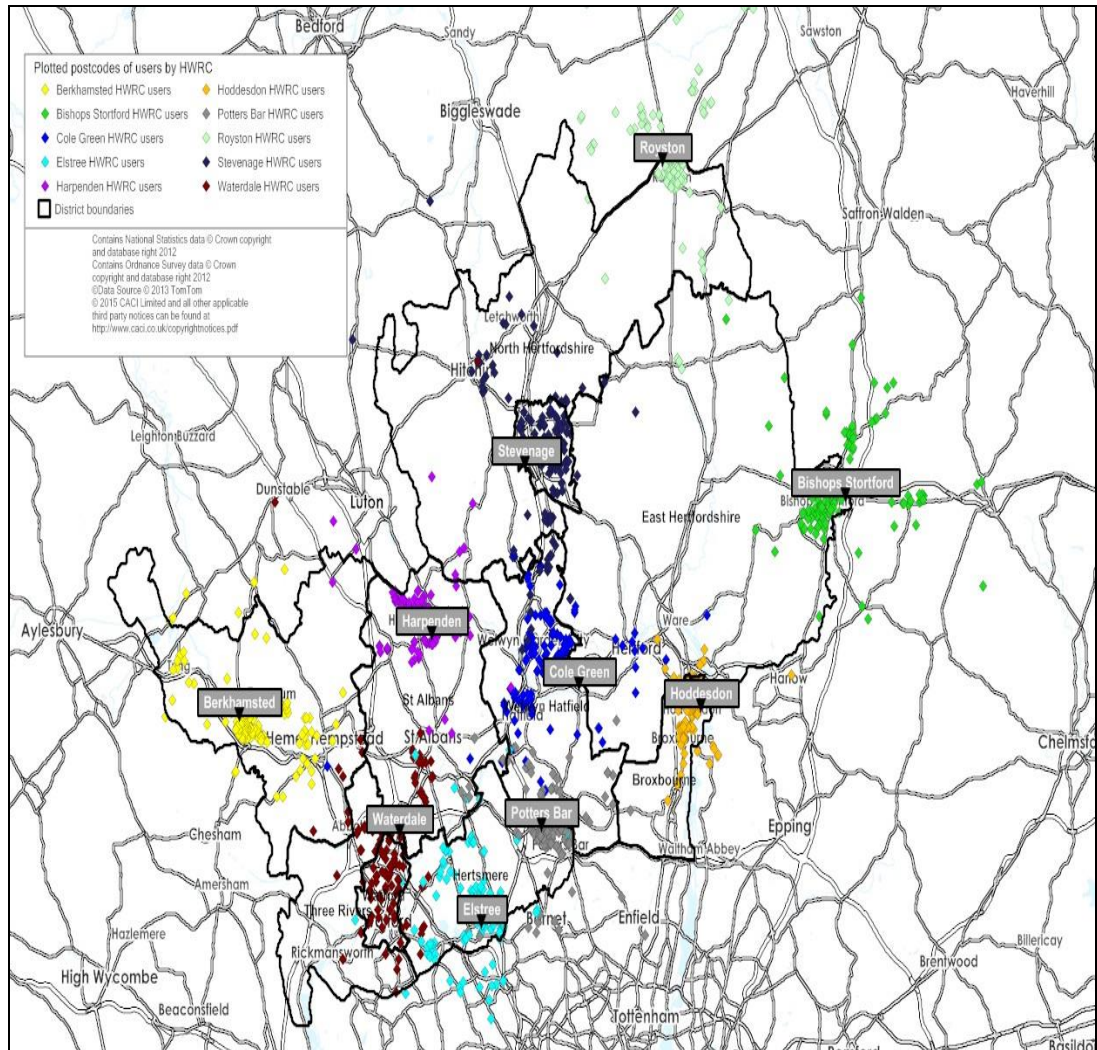


When asked if respondents visit other HWRC in neighbouring Counties, overall the majority (94%) only used Hertfordshire sites. Of the 6% who did visit neighbouring sites around a third visited at least once a month. When compared by site this was the case for all sites, although at Royston 18% said they visited other HWRCs.

Do you visit other HWRCs in neighbouring counties i.e.e Essex, Beds, Bucks or the London Boroughs?



Overall travel catchment of users surveyed



Appendix F - Equality Impact Assessment

Equality Impact Assessment (EqIA)

STEP 1: Responsibility and involvement

Title of proposal/ project/strategy/ procurement/policy	Implementation of a new policy for dealing with Aggressive and Antisocial behaviour at the Household Waste Recycling Centres (HWRCs)	Head of Service or Business Manager	Simon Aries ext: 25255
Names of those involved in completing the EqIA:	Linda Whitehead, Jessie Harrison-Ford	Lead officer contact details:	Mark Simpkins Ext. 26175
Date completed:	18 May 2016	Review date:	May 2017

STEP 2: Objectives of proposal and scope of assessment – what do you want to achieve?

Proposal objectives: – what you want to achieve – intended outcomes – purpose and need	<p>Amey, who operate the HWRCs under contract have raised concern over the number of abusive or aggressive incidents involving members of the public and their site staff, as well as problems where residents do not follow the County Council's waste acceptance policies. As a result, officers have developed a new policy in conjunction with Amey and other relevant bodies to provide clear protocols for dealing with any incidents.</p> <p>The outcome of this EQIA is to identify and assess the impact of the new policy on Hertfordshire residents.</p> <p>The suggested policy will address three specific areas:</p> <ol style="list-style-type: none"> 1. Aggressive behaviour towards operatives and users. 2. Abuse of HWRC waste acceptance policies and site rules. 3. Fly tipping in or outside the site. <p>A separate EqIA has already been carried out for the service changes implemented by Amey at the HWRCs in January 2015 and a public consultation was carried out.</p> <p>This assessment specifically relates to the suggested policy changes put forward by Amey.</p>
Stakeholders: Who will be affected: the public, partners, staff, service users, local Member etc	<p>Internal Existing Contractor's Staff and visiting HCC Staff County Councillors</p> <p>External Hertfordshire residents / site users District and Borough Council members Town and Parish Councils A range of other stakeholder groups – e.g. Residents Associations, Environmental organisations). Herts Waste Partnership</p>

STEP 3: Available data and monitoring information

Relevant equality information For example: Community profiles / service user demographics, data and monitoring information (local and national), similar or previous EqlAs, complaints, audits or inspections, local knowledge and consultations.	What the data tell us about equalities
<p>Customer satisfaction surveys (County Council tracker, 2003 – 2010 and MEL Survey 2015)</p> <p>Based on data from 4,200 interviews</p>	<p>Satisfaction with the service is high in all areas (Facilities, site cleanliness, helpfulness of staff and user-friendliness of sites). Satisfaction has remained at 74% and above in all of these areas since 2003.</p> <p>Whilst it is not possible to disaggregate the data by protected characteristics, it is possible to identify that the overall levels of satisfaction with the service are high and that any change to the service should ensure that customer satisfaction remains above 70%.</p>
<p>Previous Equality Impact Assessments</p>	<p>Two EqlA assessments have already been carried out for the procurement of the HWRS contract and the service changes implemented by Amey in January 2015.</p> <p>These EqlAs looked at the impact on service users, so have already identified the characteristics that need to be considered for any changes to the service.</p>
<p>Complaint data regarding the HWRC service.</p>	<p>Complaints regarding the service are monitored on a monthly basis by Amey as part of their Key performance Indicators.</p> <p>We have been able to establish the following information in respect of the number of abusive incidents on site towards staff by members of the public from interrogating Amey's AIRSWEB reporting system and site diaries for the period:</p> <ul style="list-style-type: none"> • 2013 - 61 cases • 2014 - 65 cases • 2015 - 82 cases <p>And the most serious of these incidents involving either aggression or physical violence where there has been police involvement:</p> <ul style="list-style-type: none"> • 2013 - 6 cases • 2014 - 11 cases • 2015 - 18 cases <p>Currently it is not possible to disaggregate the data by protected characteristics. However, as part of the implementation of the new policy this data will now be recorded.</p>

STEP 4: Impact Assessment – Service Users, communities and partners (where relevant)

Household Waste Recycling Centres - Site Users		
Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
Age	<p>The policy will apply to all users of the HWRCs, so it is unlikely that any specific age group will be affected.</p> <p>However, we are aware that there are some conditions generally associated with age i.e. dementia, where service users may come across as confused and or aggressive. Accordingly they will be supported as much as possible by staff.</p>	<p>To ensure all members of the public are fully aware and understand the new policy, clear communication to be available, including large font on both signage and easy read documentation explaining that aggressive and antisocial behaviour is not tolerated on our sites.</p> <p>Staff will be briefed to work with vulnerable service users including those with Dementia.</p> <p>Monitor and review the complaints and feedback after one year.</p> <p>Carry out a review one year after the implementation of the policy to assess the impact.</p>
Disability Including Learning Disability	<p>The policy will apply to all users of the HWRCs.</p> <p>There may be an impact on those with learning difficulties understanding the policy. e.g. Disabilities such as Asperger's or deafness may have an effect in the way people interact</p>	<p>Ensure that staff on site are available to explain the policy, if requested to all site users and have had awareness briefing on best practice when providing customer care to site users with disabilities.</p> <p>Ensure clear communication so all members of the public are aware of new policy.</p> <p>Consider communicating changes in alternative formats including large print and easy read.</p> <p>Monitor and review the complaints and feedback after one year.</p> <p>Carry out a review one year after the implementation of the policy to assess the impact.</p>
Race	<p>People whose first language is not English may find it difficult to understand the policy.</p> <p>People from different cultures may come across in different ways. E.g. Such as the tone of their voice, emphasis or colloquialisms used and this may</p>	<p>Ensure clear communication so all members of the public are aware of the policy and staffs have received appropriate culture awareness briefing.</p> <p>Posters and cards promoting HCC's language line service to be clearly visible and available at</p>

Household Waste Recycling Centres - Site Users		
Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
	cause confusion or misunderstanding by site users.	<p>each HWRC.</p> <p>Written communication to be in simplified English in order for easy translation via HCCs language line or Google translate.</p> <p>Amey staff to receive full briefing on the use of language line and record when used on site.</p> <p>Monitor and review the complaints and feedback after one year.</p> <p>Carry out a review one year after the implementation of the policy to assess the impact.</p>
Gender reassignment	No negative impacts currently identified.	Review and monitor
Pregnancy and maternity	No negative impacts currently identified.	Review and monitor
Religion or belief	No negative impacts currently identified.	Review and monitor
Sex	No negative impacts currently identified. The consultation responses indicate a comparable level of usage from each sex.	Review and monitor
Sexual orientation	No negative impacts currently identified.	Review and monitor
Marriage & civil partnership	No negative impacts currently identified.	Review and monitor
Carers (by association with any of the above)	No negative impacts currently identified.	Review and monitor
Opportunity to advance equality of opportunity and/or foster good relations (Please refer to the guidance for more information on the public sector duties)		
<p>The Household Waste Recycling Service is available to all Hertfordshire's residents. The suggested policy changes for dealing aggressive and anti-social behaviour will impact all residents that use the service.</p> <p>The proposed policy may have a differential impact on certain protected characteristic groups as identified above. The county council will work with Amey and the Herts Waste Partnership to promote and encourage alternative methods of waste disposal to all areas of the community, including greater reuse of materials, which may encourage different groups to work together and foster relations.</p> <p>The need for residents to visit a HWRC should be infrequent, especially when taking into consideration the increase in materials collected at the kerbside, therefore it is anticipated that the impact of the new policy on residents will be minimal.</p> <p>Should the proposed policy be recommended by the Community Safety and Waste Management Panel, a further assessment should be carried out to ensure the changes are fairly and clearly communicated to all groups.</p> <p>Explaining that the new policy is designed to protect both site operatives and users (and that in making proposals that have an impact on services it always seeks to minimise the impact on</p>		

Household Waste Recycling Centres - Site Users		
Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
Hertfordshire residents on the whole) may help to demonstrate a commitment to fairness.		

Household Waste Recycling Centre - Amey Site Staff		
Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
Age	The policy will apply to all Amey staff and Amey casual workers on the HWRCs, all of which will be of working age.	<p>To ensure all members of staff including casual workers are fully aware and understand the new policy.</p> <p>Staff will be briefed to work with vulnerable service users including those with Dementia.</p> <p>Monitor and review the complaints and feedback after one year.</p> <p>Carry out a review one year after the implementation of the policy to assess the impact.</p>
Disability Including Learning Disability	<p>The policy will apply to all Amey staff and Amey casual workers on the HWRCs.</p> <p>There could be an impact on staffs who may have learning difficulties understanding the policy. Also, disabilities such as deafness may have an effect on how staffs interact with site users.</p>	<p>Ensure that staff on site fully understands the policy after receiving customised briefing.</p> <p>Consider communicating training materials and documentation in alternative formats including large print and easy read.</p> <p>Monitor and review the complaints and feedback after one year.</p> <p>Carry out a review one year after the implementation of the policy to assess the impact.</p>
Race	<p>Staff, including casual workers, whose first language is not English may find it difficult to understand the policy.</p> <p>People from different cultures may come across in different ways. E.g. Such as the tone of their voice, emphasis or colloquialisms used. This may add to confusion or misunderstanding when trying to explain the new policy to site users.</p>	<p>All Amey staffs and casual workers to receive appropriate culture awareness briefing.</p> <p>Amey staff to receive full briefing on the use of language line and record when used on site.</p> <p>Posters and cards promoting HCC's language line service to be clearly visible and available at each HWRC.</p> <p>Written communication to be in simplified English in order for easy translation via HCCs language line or Google translate.</p> <p>Monitor and review the complaints and feedback after one year.</p>

Household Waste Recycling Centre - Amey Site Staff		
Protected characteristic	Potential for differential impact (positive or negative)	What reasonable mitigations can you propose?
		Carry out a review one year after the implementation of the policy to assess the impact.
Gender reassignment	No negative impacts currently identified.	Review and monitor
Pregnancy and maternity	On notification of pregnancy carry out risk assessment for potential aggressive behaviour situations.	Review and monitor
Religion or belief	No negative impacts currently identified.	Review and monitor
Sex	No negative impacts currently identified.	Review and monitor
Sexual orientation	No negative impacts currently identified.	Review and monitor
Marriage & civil partnership	No negative impacts currently identified.	Review and monitor
Carers (by association with any of the above)	No negative impacts currently identified.	Review and monitor
Opportunity to advance equality of opportunity and/or foster good relations (Please refer to the guidance for more information on the public sector duties)		
<p>Explaining that the new policy for dealing aggressive and anti-social behaviour is designed to protect both Amey site operatives working on behalf of the county council and site users and is designed to demonstrate a commitment to fairness.</p> <p>The proposed policy may have a differential impact on certain protected characteristic groups as identified above.</p> <p>The county council will work with Amey and the Herts Waste Partnership to promote and encourage alternative methods of waste disposal to all areas of the community, including greater reuse of materials, which may encourage different groups to work together and foster good relations.</p> <p>Should the proposed policy be recommended by the Community Safety and Waste Management Panel, a further assessment should be carried out to ensure the changes are fairly and clearly communicated to all groups.</p>		

STEP 5: Gaps identified

Gaps identified Do you need to collect more data/information or carry out consultation? (A 'How to engage' consultation guide is on Compass). How will you make sure your consultation is accessible to those affected?	<p>We do not have detailed data on the use of HWRCs by people with protected characteristics. There is data available for a proportion of residents that responded to the consultation however not all respondents completed the equalities and diversity section of the consultation and care should be taken when reviewing the information as this data reflects those that responded to the consultation rather than all users.</p> <p>We shall monitor the number and types of aggressive and antisocial behaviour on an annual basis, and look at whether data improves after the policy is implemented.</p>
--	--

STEP 6: Other impacts

There are no further impacts that can be identified from implementing the new policy.

STEP 7: Conclusion of your analysis

Select one conclusion of your analysis	Give details
<input type="checkbox"/> No equality impacts identified <ul style="list-style-type: none"> No change required to proposal. 	
<input checked="" type="checkbox"/> Minimal equality impacts identified <ul style="list-style-type: none"> Adverse impacts have been identified, but have been objectively justified (provided you do not unlawfully discriminate). Ensure decision makers consider the cumulative effect of how a number of decisions impact on equality. 	<p>All site users will be impacted by the new policy.</p> <p>However, the need to visit HWRCs should be infrequent; measures are in place to ensure that certain groups are not adversely impacted by the proposed service changes and arrangements will be put in place to review the impact.</p> <p>Clear communication will be essential if service changes are implemented.</p> <p>This EqIA should be reviewed annually to ensure no protected characteristic group are unfairly affected.</p>
<input type="checkbox"/> Potential equality impacts identified <ul style="list-style-type: none"> Take 'mitigating action' to remove barriers or better advance equality. Complete the action plan in the next section. 	
<input type="checkbox"/> Major equality impacts identified <ul style="list-style-type: none"> Stop and remove the policy The adverse effects are not justified, cannot be mitigated or show unlawful discrimination. Ensure decision makers understand the equality impact. 	

STEP 8: Action plan

Issue or opportunity identified relating to: <ul style="list-style-type: none"> Mitigation measures Further research Consultation proposal Monitor and review 	Action proposed	Officer Responsible and target date
Potential criticism and/or challenge of the new aggressive and anti-social behaviour policy.	<p>Monitor and review the policy, if implemented, including the feedback and complaints from the public to assess the impact.</p> <p>Continue to work with Legal Services to ensure that the policy remains legally compliant.</p>	<p>Contractor and Contract Manager</p> <p>Continuously.</p>
There may be some confusion regarding new policy	<p>Ensure that the new policy is prominently display on Hertsdirect and at the sites.</p> <p>Communications to include, but not limited to large print/easy</p>	<p>Contractor/Communications/ Contract Delivery Team.</p> <p>Once policy changes are agreed.</p>

Issue or opportunity identified relating to: <ul style="list-style-type: none"> – Mitigation measures – Further research – Consultation proposal – Monitor and review 	Action proposed	Officer Responsible and target date
	read/Braille.	
Monitor and Review	Monitor and review the service changes, if implemented, including the feedback from the public to assess the impact that the changes are having.	One year from implemented service changes.
Set out key expectations from the site users in bold and bullet points available as they enter.	Suggested wording: This site takes the health and wellbeing of its staff seriously and operates a zero tolerance policy. Please ask for our full policy.	HWRCs
Ensuring staff understand ways of accessing Language Support	-Arrange demonstration of Language Line for staff -Make available Language Line posters at each site so that staff can easily identify language spoken by those service users whose first language is not English -Provide clear instructions to staff on how to access Language Line including the phone number and the ID code used.	HWRCs staff with the help of E&D team
Raising awareness of different protected characteristics to better understand some common behaviours	Identify common behaviours and offer awareness raising E&D sessions accordingly	HWRCs staff with advice and guidance from the E&D staff