



## **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**

**Head of Service:- Marcus Lloyd**

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

**Date:- 21/09/23**

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

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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.

## **Step 2**

If the bin contains contaminants 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.

## **Step 3**

If the bin contains contaminants for a third week, the bin will not be emptied. A member of the waste team will attempt to visit the property. The purpose of this visit to provide information, advice and guidance.

If we are unable to speak with the resident we will leave a second letter at the. The letter will explain that if the contaminants are not removed, the bin will be removed from the property.

## **Step 4**

If the bin contains contaminants for a fourth week, the bin will be removed from the property.

Following an appraisal of how some exemplar Authorities are tackling this issue, the waste management team have discussed some 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?**

The proposal could have a negative impact on some older residents who may be confused by the service.

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

Confusion may be mitigated through the visit from a member of the waste team whereby the service is explained face to face. However, this will only be the case if the resident answers the door. Telephone numbers are provided on all correspondence, correspondence is bilingual. All literature will also link to the council's website.

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

The service is available to all individuals

### 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?**

The proposal could have an impact on those with a disability. Some people may struggle with their bins

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

During the visit the waste team can provide advice and guidance. However, this relies on the resident answering the door. Telephone numbers are provided on all correspondence, correspondence is bilingual. All literature will also link to the council's website

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

The service is available to all individuals



**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?

(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?

(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?

(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?

(iii) 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?

(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?

(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?

(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 issue of a fixed penalty notice will have a negative impact on low income/income poverty.

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

The issue of a fixed penalty notice is a last resort. The process will be initiated with a sticker, letters/recycling information to follow and a visit from a member of the waste team. Telephone numbers are provided on all correspondence, correspondence is bilingual. All literature will also link to the council's website

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

The service is available to all individuals



**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?**

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

**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?**

N/A

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

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

**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?**

N/A

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

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





**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?**

The proposal could have a negative impact on low with low literacy levels. The process relies on residents being able to read the recycling literature and letters sent to them in the post.

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

This can be mitigated during the visit from a member of the waste team who can explain the service face to face. However, this relies on the resident answering the door. Telephone numbers are provided on all correspondence, correspondence is bilingual. All literature will also link to the council's website

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

The service is available to all individuals

**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?**

As above

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

The service is available to all individuals

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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** - Improve education opportunities for all

The proposal will provide an educational service for those residents who may not know what can or cannot be recycled. By providing the advice, guidance and information through letters and face-to-face we can look to increase the environmental awareness of these people.

##### **Objective 2** - Enabling employment

The department is looking to employ 6 Recycling Advisors to help us deliver the contamination campaign.

##### **Objective 3** - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people’s well-being

Effective recycling supports a positive living environment for all residents living in the county borough which will ensure positive well-being.

##### **Objective 4** - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment N/A

##### **Objective 5** - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015

Effective recycling supports a positive living environment for all residents living in the county borough which will ensure positive well-being.

##### **Objective 6** - Support citizens to remain independent and improve their well-being

The proposal will provide an educational service for those residents who may not know what can or cannot be recycled. By providing the advice, guidance and information through letters and face-to-face we can look to increase the environmental awareness of these people allowing them to remain independent and improve their well-being.



**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**

By preventing non-recyclable materials from entering the recycling stream we can produce a better quality feedstock, enabling more materials to be recycled.

**Integration**

Working with partners across the organisation including the Enforcement team, recycling collection crews

**Collaboration**

Working with partners across the organisation including the Enforcement team, recycling collection crews

**Involvement**

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 including:
  - 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
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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. This will allow us to work towards to Welsh Government's aims in the waste Strategy – 'Towards Zero Waste.' The overarching aim is to become a 'zero waste' society by 2050.

The proposal will support and provide good quality jobs, in turn supporting the local economy through the development of local skills and providing training.



### **A Resilient Wales**

The proposal will support and help us work towards a Circular Economy. 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. All key objectives in 'Towards Zero Waste' the Welsh Government's strategy for Wales.

### **A Healthier Wales**

The proposal will encourage and provide employment opportunities, which in turn will benefit people's lifestyles and their mental and physical wellbeing. 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. By increasing recycling we will encourage people to become more sustainable with their waste encouraging a cleaner and greener environment for all.

### **A More Equal Wales**

The proposal will support people and our communities in an equal manner by providing employment for people from all backgrounds. This is a universal service for all residents in the county borough regardless of background or circumstances.

### **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 and encourages any service users to speak their first language (where Welsh, English or any other).

### **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 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

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## 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?**

The department is committed to complying with the requirements of the Language Act and we are committed to complying with Welsh Government target for 1 million Welsh speakers by 2050. And as a matter of course issues all its communications bilingually. The department has a significant proportion of Welsh speakers across all tiers and are able to 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 are emblazoned with bilingual narrative and branding.

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

N/A

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

### 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?**

As above.

**(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?**

As above, everything we do is fully bilingual offering significant opportunities to promote the Welsh language. We will ensure that those requiring support to be delivered in Welsh are in no way treated differently to those who use English as their first language. The service will always be delivered using the service users preferred 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*

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

- (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?
- (iii) 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?  
As above
- (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/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)*

**Key relevant findings**

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

**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.*

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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.**

The waste management team have discussed some options with the elected members of the Waste Review Working Group to continue with the current contamination process but include the issue of a legal notice and fixed penalty notices for those residents who continue to abuse the recycling service.

**Who was consulted?**

Elected members of the Waste Review Working Group

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

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

**What were the key findings?**

To continue with the current contamination process but to include the issue of a legal notice and fixed penalty notices if residents continue to fail to comply with the rules of the recycling service

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

Yes



## 10. Monitoring and Review

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

The proposal will be monitored based on recycling, residual and food waste tonnages collected through Waste Data Flow.

In cab (participation monitoring, contamination, hygiene, assisted, nappies etc).

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

Waste Data Flow – for example monitoring food waste tonnages, refuse, recycling etc.

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

The use of the data will allow us to further improve the collection methods and frequencies to ensure our ways of working remain sustainable. The results of the monitoring will link directly into the Welsh Government's aim of zero waste by 2050.

**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, Hayley Jones, Marcus Lloyd, Nathan Jones

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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).*

To ensure Caerphilly is able to achieve the required Welsh Government statutory Recycling target of 70% in 2024/25.

To ensure Caerphilly is best placed to move beyond the required 2024/25 recycling target of 70% in subsequent years and be best placed to work towards the zero waste Welsh Government aspiration.

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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:-

Brief description of the amendments/update:-

Revision Date:-

#### ➤ Version 2

Author:-

Brief description of the amendments/update:-

Revision Date:-

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#### Integrated Impact Assessment Author

Name:-

Job Title:-

Date:-

#### Head of Service Approval

Name:-

Job Title:-

Signature:-

Date:-