South Ribble Council

Final Internal Audit Report

**Waste Management** 2022/2023

Audit Assurance: Limited

Auditor: David Holgate/Jacqui Murray

Date Issued: 3<sup>rd</sup> January 2023



Cert No: 20128 ISO 9001





### Reason for the Audit & Scope

The Council's Waste Collection Service is now delivered by an in-house team after the contract with FCC Environment Services, who had provided this service on behalf of the Council for many years, ended in June 2022. The in-house Waste Management Service offers household waste removal and recycling services to all homes in South Ribble with additional costs levied for garden waste, bulky waste collections and new container requests.

The review will evaluate the processes and procedures that have been adopted since transition, assessing ongoing adherence to UK waste regulations and any associated governmental guidance.

The review is included in the 2022/23 Annual Audit Plan approved by the Governance Committee on the 27th September 2022.

The review considered progress made with the Mobilisation Action Plan effected to facilitate the smooth transition of the service from the previous waste provider to an in-house service. Trade Waste was not included within the scope of this review.

### **Audit Objectives**

- The overall objective of the audit was to provide an opinion of the adequacy, application and reliability of the key internal controls put in place by management to ensure that the identified risks are being sufficiently managed.
- The audit also assessed the effectiveness of the various other sources of assurances using the three lines of defence methodology.
- The audit will focus on specific risks where the controls in place mitigate a gross red / amber risks to a residual green risk. In addition, all fraud risks and performance management data will be included within our work.

#### **Audit Assurance**

- This is the first scheduled review for the South Ribble Waste Management Service since it was brought in house on the 11<sup>th</sup> June 2022.
- 7 The Head of Internal Audit is required to provide the Governance Committee with an annual audit opinion on the effectiveness of the overall control environment operating within the Council and to facilitate this each individual audit is awarded a controls assurance rating. This is based upon the work undertaken during the review and considers the reliance we can place on the other sources of assurance.
- 8 Appendix A shows the risks recorded on GRACE for Waste Management and the assurance opinion awarded to each. A risk workshop was held with the Waste Services team to aid with the formation of the service risk register.

Due to the number of high level risks inherent within the Waste Management Service and the process changes that may occur as the in-house service is embedding, ownership of the risk register needs to be clearly assigned and reviewed frequently to ensure all emerging risks are captured and the mitigating controls fully documented.

Our evaluation of the reliance we can place on the three lines of defence is also shown.

9 The Council is now undertaking the collection of residential household waste using an in-house team; this came into effect on 11<sup>th</sup> June 2022.

A Mobilisation Plan was put in place to ensure the smooth transition of the service from the previous waste provider. Our review established that although a good proportion of the key tasks outlined in the

Mobilisation Plan are completed, the momentum for delivering the plan appears to have waned with actions still in progress or outstanding with no indication of an anticipated date for completion. Furthermore, several tasks marked as complete on the mobilisation plan still have elements outstanding and supporting evidence could not be obtained.

Operationally many aspects of the service are continuing in line with the well-established processes in place under the previous waste provider and to provide direction for future service delivery, a Waste Collection Strategy is currently being drafted.

Given Waste Services is considered by the Health and Safety Executive to be high risk, the Council is currently unable to evidence that all aspects of Health and Safety is effectively embedded with a lack of up to date documentation and training/training records. Further, operatives need to be reminded about the requirement to report near misses, accidents and incidents and management to ensure a good health and safety culture is maintained.

Roles and responsibilities of supervisors and waste officers need to be clearly defined, and a robust regime of formally documented checks should be introduced to ensure that a quality service can be delivered and that concerns / breaches of policy are appropriately escalated. Key roles regarding implementing areas of compliance and application of technical competence are not reflected in the current structure that were integral when the service was contracted to FCC.

The procurement of CCTV equipment for the Council's fleet be prioritised to safeguard assets, aid with insurance claims and help protect staff and the public.

Acknowledgement has been given during our review to the legacy issues that the Council has inherited from the previous waste contract and to the fact that the Service is realigning and taking steps to entrench itself into Council culture and corporate requirements since June 2022; our findings aim to strengthen this further. However, due to the significance of the Health and Safety risks highlighted and the potential repercussions this may have for the Council a **Limited** assurance rating has been awarded for this review. The action plan at Appendix B provides further details of the findings and risks identified.

#### **Control Rating Key**

**Full –** the Authority can place complete reliance on the controls. No control weaknesses exist. **Substantial** – the Authority can place sufficient reliance on the controls. Only minor control weaknesses exist. **Adequate** – the Authority can place only partial reliance on the controls. Some control issues need to be resolved. **Limited** – the Authority cannot place sufficient reliance on the controls. Substantive control weaknesses exist

Risk and Controls	Control Evaluation
Risk 1 - Unable to maintain appropriate level of resource (staffing	
levels/vehicles)	
Waste Collection Strategy provides direction for the service	Action 1
*Mobilisation action plan in place to facilitate change	Action 2
*Roles and responsibilities are clearly outlined	Action 4
*Business Plan 2022/23 setting out the key projects and programs for the year	Working as intended
Capacity planning in place to ensure service operates effectively	Action 5
Supervisors undertake operational checks on waste crews	Action 10
Performance indicators monitored to ensure targets are being met	Action 14
Risk 2 – Health & Safety responsibilities and practices are not clearly	
assigned, documented and undertaken	
Corporate Induction	Action 6
Health and safety training provided	Action 6 & 8
Health and safety safe working practices procedures completed and reviewed	Action 7
annually	
Insurance in place and considered in the annual renewal	Working as intended
Safe Driving Practices implemented and reinforced	Working as intended
Confrontational register communicated with waste crews	Action 7
Route planning procedures in place including risk assessments	Action 7
Risk Assessments undertaken for all tasks in the service	Action 7
Supervisors undertake operational checks on waste crews	Action 7
Clinical Household Waste regulations followed	Action 8
Accident forms are completed in line with incident reporting procedures	Action 9
PPE issued correctly and reordering process in place	Working as intended
Supervisors undertake operational checks on waste crews	Action 10
CCTV on waste vehicles	Action 11
Risk 3 - Breach of waste management regulations/guidance	
Waste Collection Strategy provides direction for the service	Action 1
Documented Working Practices to ensure performance is consistent and in line	Action 4
with legislation	
Officer knowledge of waste industry kept up to date	Working as intended
Clinical Household Waste regulations followed	Action 8
Risk 4 – Poor awareness of Council's Waste Management Services leading	
to dissatisfaction and complaints	Action 2
Resident Surveys conducted too assess whether the Waste Management service meets residents needs	Action 3
Publication of Waste Service information	Action 12
All customer contacts dealt with by Customer Services (Gateway)	Action 13
Project Campaigns to raise awareness Waste related subjects	Working as intended
Penalties/Fines - Repeat Offenders Monitored	Action 16
Proactive Environmental Education Programme run in schools	Working as intended
Dealing with complaints in line with corporate procedures	Working as intended Working as intended
Risk 5 - Bin collections are missed due to ineffective policies and	Working as interided
procedures	
Waste Collection Strategy provides direction for the service	Action 1
Documented working practices to ensure practices are consistent and legislation	Action 4
is adhered too	, (01,011 1
Route Planning procedures in place including risk assessments	Action 7
Supervisors undertake operational checks on waste crews	Action 10
Dealing with complaints in line with corporate procedures	Working as intended
Alternative provision for uncollectable roads	Working as intended
CCTV on waste vehicles	Action 11
Publication of Waste Management Service information	Action 12
All customer contacts dealt with by Customer Services (Gateway)	Action 13
The second secon	

Performance indicators monitored to ensure targets are being met	Action 14
Risk 6 - Lack of consideration for vulnerable residents	
Resident surveys conducted too assess whether the Waste Management	Action 3
service meets residents needs	
Publication of Waste Management Service information	Action 12
All customer contacts dealt with by Customer Services (Gateway)	Action 13
Assisted Collections Register for residents managed and communicated to	Working as intended
operatives	
Risk 7 - Procedures for income management are not robust (bulky	
collections/green waste collection)	
Charges reviewed at regular intervals	Action 17
Receipting system for payments	Working as intended
Garden Waste Subscription Service	Action 17
Container Requests (Existing Properties)	Working as intended
Container Requests (New Developments)	Working as intended
Bulky Waste income monitored	Working as intended
Risk 8 - Inadequate budget allocation and monitoring arrangements	
Performance indicators monitored to ensure targets are being met	Action 6
Budget Monitoring Procedures in place to keep track of cost variations	Working as intended
Allocated Budget set out for the service	Working as intended
Risk 9 – Robust business continuity arrangements are not formalised	
Adverse Weather Policy	Action 15
Business Continuity arrangements in place for the service	Action 15
Risk 10 - Failure to implement processes and procedures to deter	
bribery/theft/fraud	
Corporate mandatory training	Action 6
Dealing with complaints in line with corporate procedures	Working as intended
Supervisors undertake operational checks on waste crews	Action 7
CCTV on waste vehicles	Action 11
All customer contacts dealt with by Customer Services (Gateway)	Action 13

<sup>\*</sup>Additional risks and controls identified by Internal Audit to be added to GRACE

# **AUDIT ASSURANCE**

### **Three Lines of Defence**

Audit Area	1 <sup>st</sup> Line	2 <sup>nd</sup> Line	3 <sup>rd</sup> Line	Internal Audit opinion
Review of Waste Management	Senior Management		Internal Audit	Reliance cannot be placed on the first line of defence whilst overall responsibilities for the service remains unclear and significant issues have been identified.

# **Risk and Control Evaluation**

Risks Examined	Full	Substantial	Adequate	Limited
Risk 1 – Unable to maintain appropriate level of resource (staffing levels/vehicles)				✓
Risk 2 – Health & Safety responsibilities and practices are not clearly assigned, documented and undertaken				✓
Risk 3 - Breach of waste management regulations/guidance			✓	
Risk 4 – Poor awareness of Council's Waste Management Services leading to dissatisfaction and complaints		✓		
Risk 5 - Bin collections are missed due to ineffective policies and procedures			✓	
Risk 6 - Lack of consideration for vulnerable residents		✓		
Risk 7 - Procedures for income management are not robust (bulky collections/green waste collection)		✓		
Risk 8 - Inadequate budget allocation and monitoring arrangements		✓		
Risk 9 – Robust business continuity arrangements are not formalised				✓
Risk 10 - Failure to implement processes and procedures to deter bribery/theft/fraud			✓	
OVERALL AUDIT OPINION				<b>✓</b>

# **MANAGEMENT ACTION PLAN**

NO.	FINDING	AGREED ACTION	OFFICER & DATE
	Strategic Direction of Waste Service & Resources		
1	The need for a Waste Collection Strategy has been identified and acknowledged by the Waste Management Service and this is currently being drafted.  Completion and approval of this will outline how household waste will be collected in a timely and economical manner whilst meeting Government targets for recycling, landfill and the promotion of waste prevention.	The draft joint Waste Collection Strategy with Chorley Council is currently being considered by SLT for committee approval in quarter 4 2022/23. The Waste Operations Manager will complete the South Ribble specific action plan by the end of January to ensure that it is in included within the final version of the Strategy.	Asim Khan/Russell Hutchinson March 2023
2	A review of the mobilisation action plan identified that a number of the tasks have not commenced or are still in progress. Furthermore, some tasks have been deemed as completed however, on further investigation we were unable to evidence completion. As such, many of the original tasks have been identified as a control weakness during the course of our review and are subsequently detailed below.  Continued focus is required to ensure that the Mobilisation Plan is completed as soon as possible to ensure successful transition and delivery of the in-house service.	The Waste Operations Manager will revisit the mobilisation action plan and appraise the outstanding actions to ensure suitable completion timescales are in place. This will be shared with the Director of Customer & Digital for approval and ongoing progress monitored monthly thereafter.	Asim Khan/Russell Hutchinson Jan 2023
3	A resident's survey was set out as a service priority for the year on the Service Business Plan however the delivery of this has now been postponed until the Government's National Waste Strategy has been released.	Work will commence on the resident's survey during 2023 in collaboration with the Communications Team. The results of the survey will help inform the Council's local waste collection objectives.	Asim Khan/Russell Hutchinson Dec 2023

Consideration should be given to undertaking the residents survey as soon as possible as it provides an opportunity to understand what the community thinks about the service currently provided and will help provide direction for effective quality improvements going forward. There is a need to ensure that roles and responsibilities of the A review of resourcing requirements for the Waste 4 Asim Khan/Head Supervisors and the Waste Officers that support the management Management Service will be undertaken during the of Service/Russell of the service need to be clarified and formalised. course of 2023 to ensure that that service has the correct Hutchinson level of resource in place to continue to provide a good There is currently a lack of clarity regarding the roles Officers are quality service to the residents of South Ribble, and help Dec 2023 undertaking. Job descriptions provided by HR were from the alleviate capacity problems facing the service due to previous waste provider supplied to the Council during the TUPE legacy issues inherited from the previous waste provider. process and it is unclear if these has been adopted by the Council. Recruitment is currently being undertaken to fill the This was particularly evident around responsibilities for health and vacant Head of Service position that will be key to safety compliance and application of technical competence. These leading the implementation of the review. were integral when the service was contracted to FCC but are not equally reflected within the current structure. Once the resourcing report has been approved for implementation, clarity of roles and responsibility will be clearly outlined within the new service structure and Furthermore, when clarity of roles is firmly established, it is essential that the administrative processes and procedures that updated job descriptions. support the delivery of the service are formalised, outlined and documented as soon as possible and shared with all depot staff to When a new service structure has been established it is essential that the administrative processes and ensure: procedures that support the delivery of the service are formalised, outlined and documented as soon as Roles and responsibilities are clearly defined; possible and shared with all depot staff. Concise and accurate instructions are provided; Clarity to the standard expected; A uniform approach is adopted throughout the service.

5	It has previously been identified that the Service is struggling to maintain the correct level of staff to deliver the current rounds/routes due to the increase in households built within the borough and legacy capacity issues inherited from the previous waste provider. Operatives are currently working overtime to ensure that rounds are completed as scheduled and if this is maintained over a prolonged period of time there is a risk that regularly working long hours adversely affecting employees work and health with fatigue potentially increasing in absence levels and unsafe working practices.  A service resourcing report has been drafted setting out the possible options to address capacity levels this should be progressed and agreed as soon as possible to alleviate the current pressures facing the service.	Agency staff have been utilised as a temporary measure to alleviate staff capacity issues however, this is not sustainable for a prolonged period due to budget constraints.  The review of resourcing requirements for the Service outlined in Action 4 aims to address this issue and ensure that a fully resourced and experienced core operational team can be maintained.	
6	<ul> <li>There was evidence of an induction process operating within the Waste Service with an induction pack provided to new starters.</li> <li>Our work however identified the following issues:</li> <li>No service specific training records were available for new starters to ascertain what training has been undertaken;</li> <li>The induction refers to a driver's handbook which is not currently in existence.</li> <li>In addition, the current induction process does not align with the Council's corporate induction process outlined within Learning Hub and there is no record of mandatory training being completed within the agreed timescales (either online or face to face).</li> </ul>	The Waste Operations Manager will ensure that a training needs analysis is undertaken for operational staff, and a comprehensive induction training programme is developed and agreed/approved with assistance from Human Resources, the Learning and Development Team and the Health and Safety Team. This will ensure operational staff are provided with suitable induction training in an appropriate format that meets the needs of officers and the service.  See Action 8 for additional record keeping requirements for staff induction.	Russell Hutchinson  Jan 2023
	Health and Safety		

7	During the insourcing phase, a considerable amount of work was undertaken to ensure risk assessments and safe systems of work were reviewed and updated.  It was however identified that this work was not fully completed. The review of risk assessments, Safe Working Practices and Control of Substances Hazardous to Health Inventories (COSHH) identified that a number of documents are missing or have passed	Since testing was undertaken additional risk assessments and Safe Working Practices have been completed/reviewed. The Waste Operations Manager will ensure that the remaining risk assessments, Safe Working Practices and COSHH Inventories are completed/reviewed imminently and that hard copies of this information in placed in an area that is accessible to the operational staff to whom the procedures apply.	Russell Hutchinson Jan 2023
	their scheduled date for review. This included 1 route risk assessment which has not been completed and 7 routes overdue for review.  All documentation and processes should be reviewed to ensure a comprehensive suite of risk assessments and Safe Working Practices are in place and renewed on a regular basis.	Waste Operations Manager will assess the current position in relation to the collection route risk assessments, evaluate the process required to review the routes, ensure a timetable for review is established and completed as soon as possible by an appropriately experienced member of staff. On completion crews will	Jan 2023
	Additionally, these documents need to be readily accessible and understood by the teams routinely undertaking the tasks outlined.  It was also identified that there is a need to implement a process of monitoring the information held within the confrontational register and effectively communicating this to drivers and waste officers undertaking collections.	be alerted to any updates that have been made to their respective route risk assessments.  The Waste Operations Manager will make further enquiries regarding the functionality of the in-cab system to ascertain if it could be used to alert to crews to risks identified on the confrontational register.	March 2023
8	Due to nature of the work undertaken within the Waste Service health and safety training is essential to safeguard staff and members of the public. Our review was unable to establish what health and safety training had been provided to Waste Officers as up to date training records were not available for review.  It was also identified that since the in-sourcing no 'Toolbox Talks' have been delivered to operational staff.	The Waste Operations Manager will confirm that all Waste Officers have been set up with a Council Learning Hub account and ensure that they complete the Council mandatory e-learning; and can access the additional learning resources appropriate to their role. Site specific training identified as essential to their role will be timetabled for completion and a record of this will to be	Russell Hutchinson  Jan 2023 (Training Needs Analysis)

A programme of health and safety training should be established and timetabled for delivery to include the following areas as a minimum:

- Hazardous Materials:
- Manual Handling;
- First Aid Training;
- Hazard and near miss identification/reporting.

maintained within Learning Hub with the associated evidence.

The Waste Operations Manager will ensure that a training needs analysis is undertaken for operational staff, and a comprehensive training programme is developed and agreed/approved with assistance from Human Resources, the Learning and Development Team and the Health and Safety Team. This will ensure operational staff are provided with suitable training in an appropriate format that meets the needs of officers and the service.

March 2023 (Training Programme)

March 2023 (Training Records)

Furthermore, a comprehensive central training record will be developed and maintained for all operational staff.

This record will include:

- Corporate Induction and site-specific induction training;
- Corporate mandatory training;
- Site-specific training i.e. risk assessments/Safe Working Practices/COSHH/Toolbox Talks;
- Health and Safety Training;
- Any other role specific training undertaken.

Furthermore, the record will be able to quickly identify training gaps that exist for any individual and all training undertaken will be evidenced by the retention of an attendance record and/or training certificate.

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9	Information on near misses, accidents and incidents can be used to	The Waste Operation Manager will liaise with the Health	Russell Hutchinson
	develop solutions to potential risks and as such these figures are	and Safety Team to identify and clarify the level and	
	regularly reported to the Council's Health and Safety Officer.	standard of reporting expected for near misses,	Jan 2023
		accidents and incidents. Once established this	
	Testing highlighted that there has been a dramatic decrease in the	information should be shared across the whole service to	
	number of near misses reported since the Waste Service was	ensure all staff are aware of their responsibility to report	
	brought in house with average figures of 20 events reported	incidents and know how to do so.	
	monthly by the previous providers in the 12 months prior to contract		
	end decreasing to only 2 events over the period June to November	Furthermore, the Waste Operations Manager will ensure	
	2022.	that all RIDDOR reportable accidents are reported to the	
		Health and Safety Team as soon as possible after the	
	Furthermore, there is evidence that a RIDDOR reportable accident	incident has occurred.	
	was not reported to the Health and Safety Officer until a month after		
	the event.		
	Depot staff need to be briefed as soon as possible to ensure that all		
	staff are aware of the requirement to report all near misses,		
	accidents and incidents as soon as possible after an event has		
	occurred.		
10	Testing identified that a level of supervisory check is being	A robust Health and Safety check will be undertaken by	Russell Hutchinson
'0	undertaken however, there is no formal approach to how checks	the Waste Officers on a quarterly basis. A checklist is	Nussell Hutchinson
	are conducted or how issues are escalated.	currently being developed for implementation in quarter 4	March 2023
	are conducted of now issues are escalated.	that will supplement the frequent supervisory checks	IVIAIGII 2023
	To ensure high standards of service are achieved and ongoing	currently in place conducted by the Operational	
	monitoring is evidenced, a review of supervisory checks should be	Supervisors.	
	undertaken to ensure that all essential high-risk areas i.e. correct	Oupervisors. 	
	use of PPE, correct operational procedures evidenced, health and	Additionally written precedures will be developed to	
	safety considerations are incorporated.	Additionally, written procedures will be developed to	
	Salety Considerations are incorporated.	support the checks undertaken and will outline:	
		The level of checks to be conducted  The framework and the above.	
		The frequency of checks	

	Furthermore, checks should be conducted on a regular basis, evidence of checks retained, and any serious issues escalated for remedial action.	<ul> <li>The need to retain evidence of checks undertaken</li> <li>The escalation process for any breaches identified.</li> </ul>	
11	The service utilises 360° cameras to investigate issues that arise during waste collection rounds, however only 6 of the current fleet of 17 vehicles have CCTV installed.  The need to extend CCTV coverage was acknowledged by the Waste Operations Manager and is included in the Mobilisation Action Plan and the service are preparing to procure new equipment for the fleet. This should be undertaken as soon as possible to ensure the Council's assets are protected from theft/damage and help reduce insurance costs and prevent fraudulent claims.  Furthermore, the Council needs to adopt a CCTV usage policy to make it clear what the cameras will be utilised for so as not to risk a breach of the Data Protection Act.	The procurement of CCTV for the waste fleet forms part of a larger CCTV procurement exercise across the organisation and it is anticipated that the method of award will be formally approved in quarter 4 2022/23 which should facilitate this finding.  The timetable for implementation will be outlined in the Mobilisation Action Plan as per Action 2.  Additionally, the Waste Operations Manager should outline what the cameras on the waste fleet will be utilised for so that this can be included within the Council's CCTV usage policy once developed.	Asim Khan  March 2023  Russell Hutchinson  March 2023
	Service Delivery / Performance Monitoring		
12	A good level of information was provided on the Councils website for waste collection and recycling services however, several hyperlinks were found to be not working and references to the previous waste contractor were still available.  If residents are unable to access accurate and up to date information on the website this may lead to an increased burden placed on Gateway Services to obtain and clarify collection information.	The Internal Audit Team will share the results of the website testing with the Waste Operations Manager to enable further investigation and liaison with the ICT team to amend the issues identified.	Russell Hutchinson Feb 2023

13	All contacts with residents are documented by Gateway using the Firmstep customer relationship management system however, there are known instances of service requests processed via Firmstep not being transferred to the Waste Management Team for action. All missing requests that have come to light have been passed to ICT for further investigation however this issue is still outstanding, and the risk of missing service requests and customer complaints remain.	Waste Operations Manager will liaise with the Head of ICT to ascertain for certain if the ongoing issue with Firmstep service request issues can be resolved.	Russell Hutchinson  Jan 2023
14	It is essential that reported performance information is accurately presented as it is used to aid decision making.  Performance Indicators (PI's) have been established for the Service as set out in the Business Plan 2022/23. However only 2 of the 3 corporately established PI's have established written procedures in place and a service level performance indicator relating to missed bins also lacks clarity with no written procedure available on request.  Furthermore, the designated Responsible Officer for the calculation and input of PI's need to be formalised.  Consideration should be given to reviewing the existing PI's to ensure that they are relevant and meaningful for the Service. Once reviewed procedures need to be documented as set out in the Council's Corporate Performance Framework.	Waste Operations Manager will contact the Policy and Performance Team to ensure that written procedures to support current PI's are present and an appropriate inputter and authoriser has been assigned for the Service.  Furthermore, PI's for the Service will be reviewed and aligned with the Waste Management Strategy once this has been approved.	Russell Hutchinson  Jan 2023  Asim Khan/Head of Service/Russell Hutchinson  March 2023
15	A Business Continuity Plan for the in-house Waste Management Service has not been developed to ensure the most critical service functions are clearly defined and prioritised, and corrective actions/processes are set out with responsibilities assigned.	Work to formalise contingency arrangements within a robust Business Continuity Plan for the Service has commenced. The Waste Operations Manager will	Russell Hutchinson May 2023

	It is essential that the plan is completed as soon as possible, and regularly tested, to ensure that all officers know their roles and responsibilities in the event of an unexpected incident/adverse weather conditions and will respond following the agreed procedures as set out to ensure that the most important functions and systems are up and running in the shortest possible time frame.	complete this exercise with assistance from the Senior Risk and Insurance Officer where required.  The final version of the Business Continuity Plan will be shared with all relevant members of the team to ensure that they are aware of their roles and responsibilities; and tested on a regular basis so that it remains fit for purpose.	
16	Crews have the ability to report contaminated bins on the in-cab devices and fix contamination labels on bin handles to alert residents to why their bins was not collected however, the Council does not have a formal policy or process in place to sanction/fine residents who continually fail to follow recycling guidelines and as such testing identified no cases where repeat offenders had suffered sanctions.  Consideration should be given to formalising policy and procedures for breaching recycling guidelines to act as a deterrent and ensure a consistent approach is taken for each case identified.	Current arrangements in place for identifying and dealing with contaminated bins will be outlined within written procedure notes to ensure a consistent approach is taken with each case identified.  The Service has a historical approach of promoting recycling habits through education and awareness campaigns and this approach will be outlined within the new pending Waste Collection Strategy.  Consideration may be given to adopting fines and penalties in the future in line with Government guidance if there is an escalation in non-compliance with the Council's waste collection rules. The Waste Collection Strategy would be updated to reflect this.	Russell Hutchinson April 2023
17	The Council's bulky waste collection service fees and garden waste subscription have not been subject to review for a number of years. A regular review of the services provided will ensure that the amount charged covers the of the cost of providing the service whilst remaining value for money for customers.	Changes to bulky waste collection fees and garden waste subscriptions will be considered by Cabinet in January 2023 as part of the 2023/24 Fees and Charges Report of the Director of Finance.	Cabinet January 2023