

Impact Assessment

Document Type	Impact Assessment
Project No.	[Project No.]
Project Name	Disaggregation - Waste Disposal
Audience for this document	
SRO, Programme Board, PMO Team	
Purpose of this document	
This Impact Assessment document is used to assess the impact of options to meet project objectives. It enables the Project Manager to evaluate the impact of the recommended approach objectively and systemically to achieving the desired outcomes.	

Document Control

Version History			
Date	Version	Author	Brief Comments on Changes
03.08.21	0.1	Juliet Baker	Initial version for W/N team comment – based on ‘business case’ and fact check documentation from Graeme Kane
04.08.21	0.2	“”	Updated following JJ review
05.08.21	0.3	“”	Updated following meetings with GK/SW
02.11.21	0.4	“”	Updated following work on the ‘Tasks, Skills and Knowledge’ audit Oct ‘21
09.11.21	0.5	“”	Updates following reviews – GK, FU, JJ
15.11.21	0.6	“”	Further updates

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1. The Business Challenge

Background

- There is a requirement to disaggregate the Waste Management and Disposal Team formally employed by Northamptonshire County Council and now part of North Northamptonshire Council (NNC) – the requirement to disaggregate¹ before April '22 was agreed in the Blueprint and set out in the Transformation Task and Finish Group Priority Disaggregation timeline (Appendix 1)
- A fact check was performed in July 2021 (and updated more recently) to gain an understanding of the work required for disaggregation and work is underway to plan the required team and enabler tasks alongside TUPE activities.
- Disaggregation is planned to take place before 31st March 2021 as per agreement in the Task and Finish Group timeline. The plan is supported by the Assistant Directors for the Service in the North and West. Finance have been made aware of the intentions.
- The purpose of this document is to demonstrate that due diligence has been given to the potential impacts, risks, and considerations for the disaggregation within the agreed timeline and to outline actions that are required before and after to mitigate risk and ensure continued successful delivery of this important Statutory Service for Northamptonshire Customers

Service Overview

- The team (10 posts including one vacancy) currently provides a service to West Northamptonshire Council (WNC) through a hosting arrangement.
- The hosting and intended disaggregation are in line with the LGR blueprint previously agreed through the LGR transformation programme.
- The services provided by the team include:
 - Waste disposal arrangements for kerbside collections, and commercial contracts
 - Closed Landfill management
 - Household Waste and Recycling Centres
- These are supported by business support services within the team particularly in relation to finance and data management

Outcomes to be achieved from disaggregation

- A disaggregated waste service (for waste disposal operations) operating independently in the North and West Northamptonshire Authorities (for in-scope services) - disaggregation of the teams, contracts, policies, processes,

¹ To note that the HWRCs contract is out of scope for disaggregation – it will continue to be hosted until 31.3.2025

statutory and GDPR (General Data Protection Regulations) requirements, data, IT, and business support provision for the above services

- Alignment with corporate strategy – Shadow Authorities agreed to establish separate waste disposal teams for WNC and NNC in line with the LGR Blueprint.
- Statutory functions and legislative requirements for the following managed independently:
 - Treatment and disposal of waste
 - Management of risk associated with closed landfills
 - Completion of statutory waste returns and data flow entries
 - Disposal of ad-hoc abandoned vehicles
- Ensuring all remaining hosted provision (HWRCs (Household Waste Recycling Centre)) are managed effectively by North Northamptonshire for West Northamptonshire
- Ensuring that the service models and supporting processes (e.g., collaborative working) recommended (interim and/or longer term) and implemented in both North and West Northants are sustainable and enable the team to carry out their statutory and other essential duties with the required capacity and resilience.

2. Scope of the work

- In scope:
 - Establish two individual waste disposal teams for WNC and NNC
 - Disaggregation of the teams, contracts², policies, processes and data, and the IT and business support provision for the above services
 - Skills gap analysis/options assessment with implementation of the recommended option(s) to cover potential skills and knowledge gap in each team as an outcome of the disaggregation – options such as collaborative working agreements, or other cover arrangements may need to be put in place for the team on an interim basis until a wider restructure of the Waste Services is carried out
- Out of scope:
 - HWRC (Household Waste Recycling Centre) contract change (IAA (Inter Authority Agreement) Schedule 2G3) - the LGR blueprint

² With the exception of the HWRC contract and other linked contracts

included a commitment for the North to host the HWRC contract and operation until the end of that contract in 2025.

- No proposal to restructure the rest of the waste team (previously the district and borough collection teams).
- Review (and implementation) of related transformational work to streamline processes between the in-scope waste team and wider waste management (ex-District and Borough functions) – this will follow disaggregation

3. Disaggregation Impact Assessment – Analysis

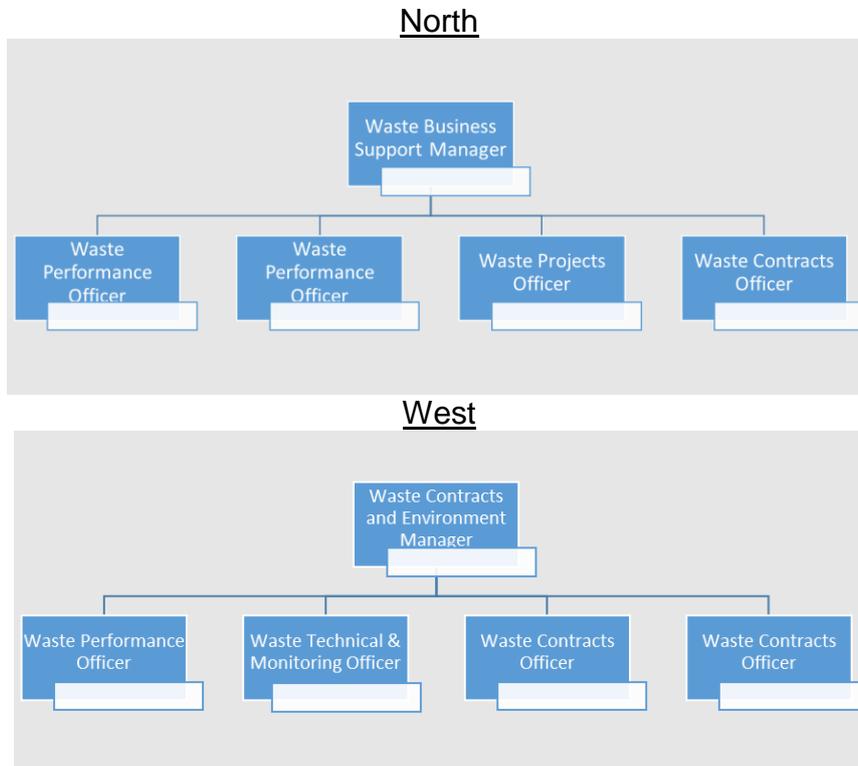
Area	Considerations
<p>People change (including HR/TUPE)</p>	<p>TUPE process is underway – the team are being engaged throughout via 1:1s and team meetings. The consultation put forward the team structure shown in 4. Recommendation. Initial concerns and questions were raised by the team around IT and data access across the authorities and how the split teams would manage the workload and resilience – these questions were fed into the consultation process and investigated</p> <p>The team are well engaged in the process - however a risk of disenfranchisement remains subject to the required support and plans being in place for training, cross working and resilience cover post-disaggregation</p> <p>An engagement plan with the team members has been developed and actioned. Additional support and opportunity to engage and provide feedback has been provided through the change and engagement managers' input.</p> <p>Integration with the rest of the Waste teams (previously District and Borough teams) will be important both to create and support the concept of 'one-team' but also to make the most of any operational synergies and plan to effectively cover any initial skills and knowledge gaps – there is an opportunity to make improvements to processes following on from disaggregation.</p>
<p>Environment/Place</p>	<p>There is a need for a permanent work location to be identified for both the North and the West teams. This is in discussion with Property Services and the Future Ways of Work team.</p> <p>ID badges and access/storage will be facilitated as required.</p>
<p>Contracts</p>	<p>There are several contracts related to services and equipment. An initial fact-finding check has identified these; some will need to be novated to the West on the disaggregation date – the novation process is in discussion with Legal enablers</p>
<p>Customer Experience</p>	<p>Customer journeys, in person, over the telephone and via the web are being reviewed to establish change requirements including for customer handling processes and will be built into the timeline</p>

	No change to web content or to the Waste e-Permit application are required Minor change to the charity permits application process may be required.
Technology/IT	IT dependencies are being identified and resolved; They will include: <ul style="list-style-type: none"> • Data cleansing and migration required to disaggregate • Starters and Leavers process for TUPE transferees
Financial including payments	Budgets <ul style="list-style-type: none"> • The former NCC budgets have already been disaggregated Payments and receipts (AP/AR) <ul style="list-style-type: none"> • In line with any transfer of contracts, respective contractors must be set up in the relevant Authority's EPR to ensure contractors can be paid in a timely manner and any receipts taken Other <ul style="list-style-type: none"> • Cross charging processes and crossover activities are being developed
Policies	Relevant policies are being reviewed and will be updated to ensure they remain fit for purpose following disaggregation and are agreed for the respective Authorities E.g., Health and Safety, etc.
Information Governance (Data Protection/GDPR)	Data sharing agreements will need to be adopted/developed to support the collaborative working interim arrangements. Any new DPIA (Data Protection Impact Assessment) and revised privacy notices will be developed, with specific note to any shared data requirements across North and West and to data retention schedules
Statutory/Legal	Novation changes, and development of a Collaborative Working Agreement, and Exit plan Process mapping to ascertain any changes to statutory processes and to develop effective 'to be's for the new authority will be carried out, with processes and roles agreed, to minimise risk of lack of compliance Change timelines must work around statutory reporting timelines
Communications	Internal – requires liaison with teams impacted by change to mitigate risk External – councillors, MP Enquiries, Fol – as above Stakeholders have been mapped and a communications plan is in development

4. Recommendation

It is recommended that the disaggregation process is taken forward, subject to the action points referenced below, as per Transformation Task and Finish Timeline before the end of March 2022.

The approach splits the team into two equal parts for North and West (in terms of costs to the service). The intended service structures are shown below:



The approach is cost neutral.

As part of the planning work for disaggregation an audit of the team’s tasks, skills and knowledge was carried out. The audit confirmed that a level of cross-working would be required for an interim period to enable the team to both upskill and to manage the day-to-day work (actual work undertaken tends to be broader than the job roles on paper), and specifically the daily management of the North-led HWRC contract.

Initially the team will also need to support one another to reduce resilience risk. Resilience and shared working arrangements set up through the collaborative working agreement cannot continue indefinitely and will need to be agreed for a fixed period. The collaborative working arrangement, training plan outcomes and resilience effectiveness should be regularly reviewed. Actions to address in the longer term could be included as part of the wider waste restructure or other recruitment/uplifts

This option will thus require the following:

- 1) A Collaborative Working Agreement
 - To confirm the provision of West resource to support statutory and non-statutory tasks including the provision of the HWRCs service

and additionally, for the North support to the West for certain activities

- 2) Training plan – to upskill/knowledge transfer (internal but documented agreement as part of the Exit plan and collaborative working agreement above)
 - Short (pre disaggregation) and longer term (post disaggregation) plan to upskill the team and to transfer knowledge essential for the role
- 3) Data sharing agreement(s)
 - To underpin the data sharing requirements of the collaborative working agreement and Training plans
- 4) Monthly review of the effectiveness of the collaborative working arrangements, upskilling and resilience
- 5) A fuller review of roles and responsibilities is recommended 3-6 months after disaggregation with potential job re-evaluation and/or acting up or similar arrangements put into place.

5. Risks

Risk Description	Impact	Mitigating Action
People	<p>Staff morale, efficiency</p> <p>Risk of staff leaving posts</p> <p>Risk of gaps in skill/knowledge/capacity when teams are disaggregated</p> <p>Ongoing working relationship maintained effectively between the North and the West</p>	<p>Engagement with Union representatives took place through the Directorate (Place and Economy) Consultative Forum in the North, which is the current staff representative body who represents the team given they are employed by NNC. The DCF was informed on 28th July 2021 of the intention to disaggregate in the coming months. A commitment was made to keep them informed. The equivalent body in the West has also been informed of the intention to disaggregate.</p> <p>An engagement plan with the team members has been developed and underway. It includes a team meeting and 1:1 meetings to explain the situation to the individuals affected.</p> <p>The TUPE process has now been undertaken and the team members have been involved in the process via 1:1s, team meeting with the opportunity to raise questions and concerns. Concerns remain around ongoing capacity/resilience post-disaggregation for which the action plan in the recommendations seek to mitigate.</p>

Equalities impact	Perceived or real equality issues experienced	Given no redundancies, an EqIA is not required. The main consideration has and will be to ensure that anyone with a protected characteristic can work effectively from their future place of work.
Enabler availability	Availability of staff to support change	Enabling functions in IT, HR, Property, Legal, Information Governance and other areas may not be available to support the work at the times required The project will be reliant on the timely support and ownership of the enabler actions.
Waste work interdependencies	Some functions may prove difficult to disaggregate	There are interdependencies within the team with individuals carrying out a range of functions across the services, which makes disaggregation challenging. This is particularly relevant to the individuals who support the HWRC service which is due to be hosted by NNC until 2025. The proposed structure and collaborative working arrangements will mitigate in the immediate term. There is a risk to be noted around movement of tonnage data – currently tonnage can be moved between lots (1, 2, 3) but post-disaggregation Lot 3 will be in North and lots 1 and 2 in the West. Confirmation of whether existing operational practices of moving waste between lots to maintain band volumes can be continued or whether a formal arrangements (e.g., treating each as commercial customers or an official agreement) is required – any potential cost implications, and how these would be covered, are to be confirmed.
Technology specific/ICT	ICT dependencies	Discussions with IT are taking place to confirm IT processes and change requirements for starters and leavers and data access – no major blockers expected IT have clarified that the shared mailboxes (required for cross working) can be accessed by the required individuals subject to licence arrangements (possible small charge)
Accommodation	Ensure both teams have a defined work location that reflects the disaggregation.	Currently, OAS is the defined workplace for the whole team. For disaggregation, the North team should be given a new work location in the North to reflect the corporate objective and to give the team a sense of belonging in the North, as well as an accessible workplace. This is in discussion with the Future Ways of Work Strategic Group.

Budget	Identify and apply sufficient budget for requirements	The budgets (West and North) need to be able to support any future team once disaggregated.
Customer experience	Risk if change is not coordinated effectively with the customer experience areas (inc. web)	Webpages and customer journeys are being reviewed to establish separate information and customer handling processes.
Legal	Required Legal enabler resource to support the development of the IAA Exit plan (2G2), any adjustments to the IAA agreement for HWRCs (2G3) and to develop the required Collaborative Working Agreements	The project will be at risk without this resource agreement. Additional clarity on the governance process for the above is needed – this may impact on timelines dependent on sign off requirements
Statutory	Performance of statutory duties, completion of returns and data flow entries	Risk here is of ensuring statutory and legislative requirements can be met – must have enough staff, trained, budget etc. and to be mitigated through the action plan in the recommendations
Contract continuation/requirement to split	Risk to continuation of service/contract split requirement	Some questions remain around the contractual arrangements that currently allow cross lot waste disposal - Authorities operating independently will not have the same flexibility in using the different waste disposal contracts currently all held in NNC. This may reduce resilience in the disposal options
GDPR/Data protection	Risk to compliance if not implemented with the change	Must be set up as required for new West team and amendments made for North, as required
Political	Potential conflicts of interest across N & W	For any resultant work carried out by the North on behalf of the West and vice versa

6. Assumptions, dependencies, constraints

The dependencies, constraints and assumptions made in forming the recommendations are documented below for the record:

Assumptions

- Posts and individuals to be transferred to the West are to be subject to TUPE arrangements
- No intention to reduce the number of posts or create redundancies or invite voluntary redundancies
- There is no proposal to restructure the wider waste team (previously the District and Borough collection teams) as part of the disaggregation work. This will be a future consideration
- An EqIA is not needed as no redundancies are expected
- Gaps in skills and knowledge can be adequately covered by alternative arrangements
- IT can be disaggregated in a straightforward way in the timescales requested (e.g., online application processes and back-office systems used)
- Data governance/GDPR requirements can be met/accepted, and legal arrangements put into place to support the change
- All enabling functions (IT, HR, Legal, IG, etc) will be available to carry out and support change work at the times required – this must be confirmed and planned into the project plan
- No conflicts of interest will be present for any resultant services managed by the north on behalf of the west or west on behalf of the north (e.g., contract management of HWRCs, or other areas required to be managed by one Authority on behalf of the other)
- The former budgets of NCC have already been disaggregated (North/West)
- The North will host the HWRC contract until end March 2025
- The team need new permanent homes in the North and West. There is an assumption that this will not be a constraint for disaggregation but that the team will be offered a new location in line with asset review (managed via separate discussion/project)

Dependencies

- Any policy change covered under GDPR/Privacy Notice would trigger review of the Privacy notice - even if triggered by contractor - i.e., use of body cams/CCTV etc.
- Any policy change that would trigger EQIA would lead to one carried out alongside policy change cabinet paper i.e., change to service

Constraints

- Intention to disaggregate N/W so the teams are split suitably to form individual teams to support the services they deliver– noting that the requirement to cover skills/knowledge for statutory and operational functions
- No intention to reduce the number of posts or create redundancies or invite voluntary redundancies

- Team preferences taken into consideration alongside establishing the business and operational need for both authorities to match posts to deliver need
- Interdependencies within the team with individuals carrying out a range of functions across the services, which makes disaggregation challenging. This is particularly relevant to the individuals who support the HWRC service which is due to be hosted by NNC until 2025.
- Customer contact and information: webpages and customer journeys reviewed to establish separate information and customer handling processes. Any change work for websites and eForms will need to coordinate with agreed websites change timelines
- There are several contracts related to the services. Some of these will need to be transferred to the West.
- Finance (AP/ AR): in line with any transfer of contracts, those contractors need to be set up in relevant authorities' ERPG to ensure contractors are paid in a timely manner.
- Relevant policies reviewed and updated to ensure they remain fit for purpose following disaggregation e.g., Health and safety, data processing
- Integration with the rest of the waste teams (previously the district and borough teams) will be important both to create and support the concept of 'one team' but also to make the most of any operational synergies - there is a more specific desire to do this in the North as the west teams will remain 'as one' in practice following the change

7. Next steps

Outline project plan

Milestone	Timeline
Approval of recommendation to progress disaggregation (Impact Assessment)	Nov '21
Inform employees of outcome (TUPE change)	Nov '21
Confirm all waste specific policy, process, health and safety, insurance, reporting and other change requirements and confirm action plan	Nov '21
Confirm all requirements to Enablers (IT, HR, ERP, Legal, IG,	Nov '21 – Dec '22
Training plan agreed and actioned	Nov '21 onwards
Action changes for disaggregation	Dec '21 – 1 st Feb '22
Develop Collaborative Working Agreement, Data Sharing and Exit plan	Nov '21 – Jan '22

Exit plan signed off (TBC)	Jan '21 - Feb '22
Disaggregation date - ERP/Payroll/AR/AP change - IT change -	1 st Feb '22
Communications plan actioned	ongoing
Employee engagement & change management activities	ongoing

Specific Planned Actions:

- Confirmation of IAA Exit plan and its constituent parts including Collaborative Working Agreement, Data sharing arrangements and the Training and Resilience Plan
- Confirmation of governance processes/timelines for Exit plan
- Continued development of full delivery plan

Monitoring and Evaluation

- Pre-project survey has been undertaken to measure baseline view of change process; this will be followed up with further surveys post-delivery at agreed intervals help measure the impact and success of the change for some of the areas outlined above
- Development of 'success factors' for the work to be considered

