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Capturing recycling – A guide to behaviour change

Introduction

This 'Capturing recycling – a guide to behaviour change' document is designed to assist local authority Waste and Enforcement Officers and Managers to successfully achieve behaviour change from residents by ensuring that all kerbside recycling and food waste is captured in the correct receptacles, and is not incorrectly placed in the residual waste stream.

The format of the guidance document follows the overarching flow diagram, given on the next page. This flow diagram is designed to be used at any stage of rolling out the behaviour change campaign, and to be used by a variety of different stakeholders.

The flow diagram details the fundamental stages that a variety of officers will input into to deliver the campaign. At the bottom of the page there are links to further information given later in the guidance document which can be accessed depending on whether you are a Waste Officer, Enforcement Officer, frontline staff, policy writer or work in communications.

Officers should note that each stage of the flow diagram is not prescriptive. Mandatory tasks which must be undertaken are provided for in the main body of the text. Any additional information is either based on a best practice approach (highlighted in a gold box) or is advisory (highlighted in a blue box).

The guidance also contains details for Waste Officers and Enforcement Officers regarding an approach for enforcing side waste and an approach for enforcing additional waste capacity. However, it has been assumed that the authority will have implemented a no side waste policy and will have removed all expired authorised additional residual waste capacity before implementing the behaviour change campaign.

The guidance is designed to have an educational approach and is not one driven by an enforcement outcome, regardless of whether the local authority will pursue the enforcement element of the campaign in reality.

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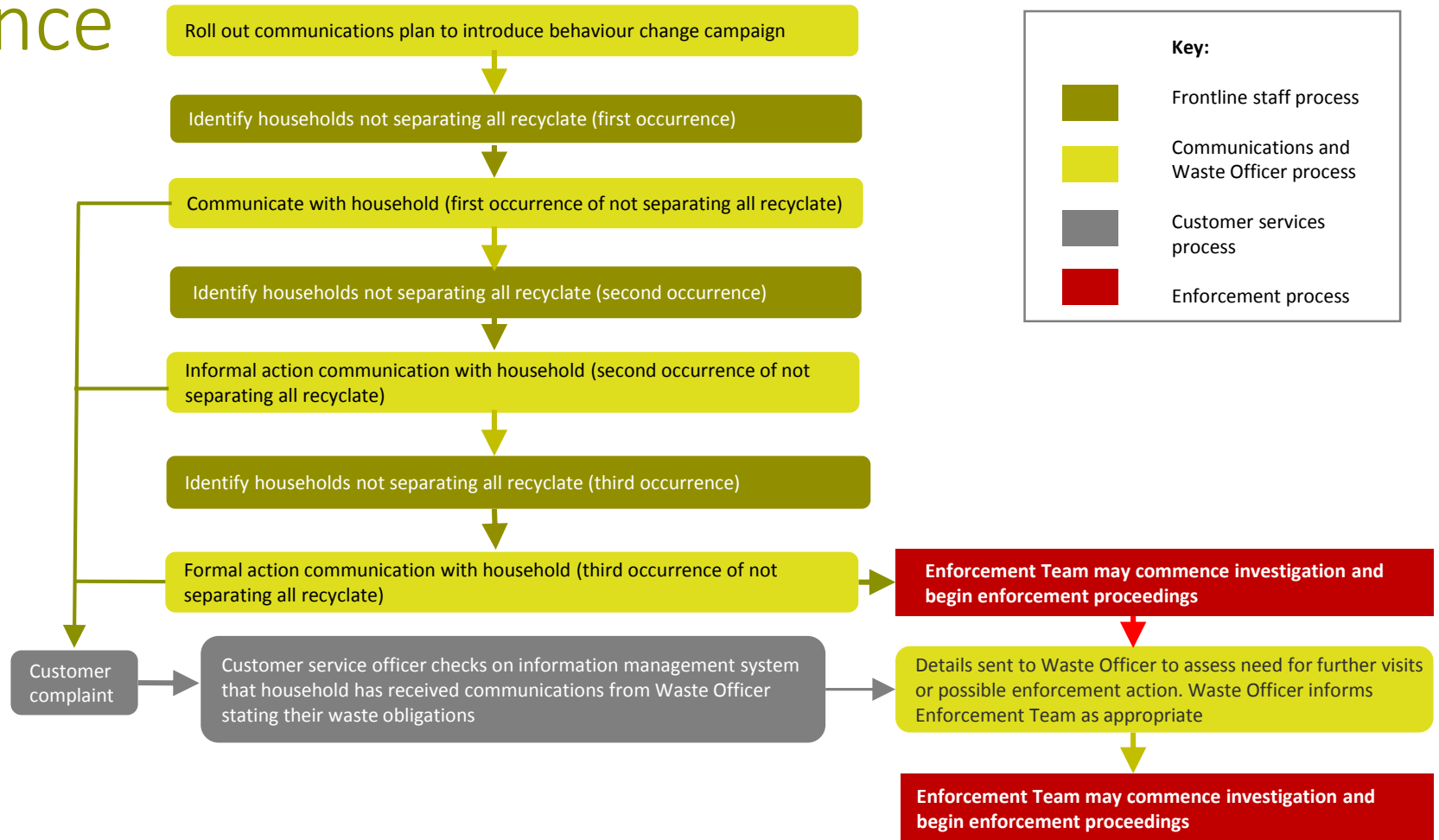
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Communications plan to
introduce behaviour
change campaign



Communications plan - introduction

Once the [behaviour change policy](#) has been approved by Members, the Corporate Communications teams (where available) and the lead Waste Officer for the behaviour change campaign should work together to develop the communications plan which will support the introduction of the behaviour change campaign.

The tone of the campaign should be an educational and supportive one, with enforcement as the last resort.

Communications plan

The communications plan should include all the activities necessary to support the campaign, including identifying who key stakeholders are, what involvement in the campaign is required of each of the stakeholders and key communication messages and methods. The plan should be broken down into the pre-, during-, and post roll out phases.

An example of a communications plan is included [here](#).

The communications plan will need to address both the internal stakeholder aspect of the service changes (i.e. those stakeholders within the council who are responsible for and/or who are affect/affected by the successful delivery of the service changes) and the external stakeholders (i.e. those stakeholders outside of the council who are responsible for and/or who affect/affected by the success of the service after implementation – namely residents).

Advisory:

For ease and robustness, ideally two communications plans should be developed. One which addresses the internal stakeholders communication engagement (such as frontline, back office, customer service, legal and enforcement staff, senior management team and Members) and one for external stakeholders (residents, town and parish councils, etc.)

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Communicating with stakeholders

Internal stakeholder communications

Implementing behaviour change can affect many different internal stakeholders to different extents and at different times. The two main categories are council departments (including waste) and Members. These may include:

- **Front line staff** – These are critical to ensuring the success and should be engaged at the earliest stage possible.
- **Operational staff / Administrative staff** – Need to provide appropriate scripting, FAQs and training to support staff.
- **Council marketing and comms team** – those responsible for all council communication activities and graphic design work, and often for communications with Members too.
- **Legal** – overall responsibility for ensuring that service changes are compliant with council legal policies and procedures.
- **Enforcement team** – Are crucial to the success of the campaign and will need to be fully briefed.
- **Waste managers and senior staff** – Engaging with back office staff is critical.

Members – Members should be aware of the aims, objectives and budgetary implications of the project. They should especially be aware that complaints may initially increase, and additional resources will be necessary to implement the behaviour change effectively.

External stakeholder communications

The target audience for the external stakeholder communications plan are the residents, and the success of the new scheme will require sustained clear communications with them. Communicating effectively with residents is achieved through both face-to-face and written communication tools.

- **Face-to-face communications with residents** – may typically include attending community-based talks and events.
- **Written communications to residents** – may include any or all of the following: leaflets, letters, press releases, website content/FAQs, social media content/posts, posters and stickers.
- **Additional communications where budget allows** - comms methods such as “Adshels” (posters in bus stops), press ads, vehicle messaging and/or door knocking activities could be considered.

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Comms plan tasks

Pre roll out:

Standard (minimal cost)

- Communications plan developed: What do residents need to know / receive / be made aware of?
- Communications methods chosen (e.g. bin stickers, letters, leaflets)
- Cabinet or Cabinet Member approval sought as appropriate
- Relevant staff briefed (internal stakeholders identified)
- Press release written and distributed
- Social media content developed
- Educational, Informal Action and Formal Action letters drafted
- Changes to FAQs / web page content

Best practice (higher cost)

- Letter sent to all residents informing them of change
- Public consultation
- Attendance at events



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Comms plan tasks

During roll out:

Standard (minimal cost)

- Communications delivered (e.g. bin stickers, letters, leaflets)
- Additional press release(s) sent out
- Further staff and internal stakeholder briefings as required
- Follow up press release written and distributed
- Social media content released in steady stream
- Updates to FAQs / web page content
- Educational, Informal Action and Formal Action letters printed and distributed as required
- Gather feedback from frontline staff

Best practice (higher cost)

- Attendance at events
- Door knocking activities

Post roll out:

Standard (minimal cost)

- Further messages developed based on feedback from frontline staff
- Updates to FAQs / web page content
- Social media content at intervals
- Editorial to media outlets

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Example communications plan – pre roll out

Activities and actions	Who responsible	Timescale
What do residents need to know / receive / be made aware of	Waste comms lead and corporate comms lead	3 months before roll out
Communications methods chosen (e.g. bin stickers, leaflets)	Waste comms lead	3 months before roll out
Cabinet approval sought for communications methods	Head of Waste team	2-3 months before roll out
Briefings for relevant internal stakeholders (i.e. council staff and members)	Head of Waste Services and waste team	6 weeks before roll out
Educational, Informal Action and Formal Action letters drafted and approved	Waste team managers and legal team	6 weeks before roll out
Social media content developed and changes to FAQs / web page content	Corporate comms	2 - 4 weeks before roll out
Press releases drafted and approved	Corporate comms and waste teams	3 weeks before roll out
Printed literature (leaflets, bin stickers) designed and approved	Head of Waste Services and waste team	4 weeks before roll out
Letters, leaflets and bin stickers printed and distributed	Corporate comms team	2 - 3 weeks before roll out
Planning for attendance at events – venues, equipment, staff	Waste team	4 weeks before roll out
Briefing for call centre staff and update for frontline staff	Head of Waste Services and waste team	1 – 2 weeks before roll out
Distribute press release no. 1	Corporate comms team	1 week before roll out

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Example communications plan – post roll out

Activities and actions	Who responsible	Timescale
Social media posts	Corporate comms and waste team	1 – 2 weeks before and during roll out
Attendance at events	Waste team	During week of roll out and 1 – 2 weeks after
Distribute press release no. 2	Corporate comms team	1 – 2 weeks after roll out
Further briefing/update for frontline staff and call centre team	Waste team managers and legal team	2 weeks after roll out
Distribute press release no. 3	Corporate comms and waste teams	3 – 4 weeks after roll out
Gather feedback from frontline staff	Waste team managers	6 weeks after roll out
Further messages developed based on feedback from frontline staff	Corporate comms	6-8 weeks after roll out
Social media posts	Corporate comms and waste team	
Adjustments to FAQs / web page content as necessary	Corporate comms and waste teams	6 - 8 weeks after roll out
Editorial to media outlets as appropriate	Corporate comms and waste manager	3 months after roll out

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Identifying households
who are not
separating all recycling
– first occurrence



Introduction

Identifying the first occurrence of households who have been found not to separate their recycling and food waste from the residual waste stream is the first on-the-ground event when rolling out a behaviour change campaign. Identifying which households may be placing recycling and food waste in their residual waste container on the first occurrence can be undertaken in four different ways. Although, it's worth noting that local authorities might consider a hybrid approach blending the district approaches. For example, blanket communications, then targeting areas using knowledge or round data.

Method one – Blanket approach

As it is nearly impossible to prove that only certain households recycle everything, taking a blanket approach when rolling out the campaign ensures that all residents receive the same message and cannot complain of differential treatment.

Method two – Segment approach

Using the theory that demographic and socio-economic factors play a part in the likelihood of a household recycling, households which fall into certain market segment categories can be targeted. The local authority chooses which classifications will be targeted and a classification tool identifies where in the locality (to road name detail) these classifications are.

There are several classification tools which local authorities can use, some of which are paid for, such as the 'A Classification of Residential Neighbourhoods' (ACORN) tool, and some of which are free, such as the WRAP segmentation tool or the Output Area Classification (OAC).

Method three - Collection crew knowledge

Frontline staff are an excellent source of knowledge when trying to identify which households may be placing recycling and/or food waste in their residual waste container. Asking staff to identify areas on their rounds which may have poor recyclers present is a straightforward and inexpensive method to engage residents about the campaign on the first collection cycle once the campaign has been rolled out.

Method four – Individual inspections

In the first weeks of the campaign, undertaking individual bin/bag inspections can either be undertaken by sub-contractors, Waste Officers or Frontline staff. Staff take a preliminary look inside each residual waste bin collected (complying with health and safety procedures as this is undertaken) to assess whether recycling may be present in the residual waste bin. Any recycling present may also be identified by listening to the bin as it is emptied.

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Advantages and disadvantages

Method one – Blanket approach

Advantages:

- Ensures that as many people as possible are directly aware of the campaign and the objectives which are trying to be achieved. This will help ensure that recycle is contained in the correct receptacle across the local authority area.
- Collection crews are aware that all households have received the educational letter and therefore that regardless of what round they're working on, the approach is the same.

Disadvantages:

- Residents who are excellent recyclers are likely to complain about receiving an educational letter.
- The postage costs of sending an educational letter to every household can be prohibitive and can therefore attract negative publicity.
- If a delivery company is chosen to deliver the educational letters then the cost is similarly high.

Method two – Segment approach (e.g. ACORN classification / Output area classification)

Advantages:

- Reduces the number of households receiving an educational letter utilising a more targeted approach, likely to reduce the number of complaints received.
- Reduced postal costs compared to the blanket approach.

Disadvantages:

- Excellent recyclers can still reside in targeted segments, so complaints are still likely.
- Reliant on accurately recording which households fall into the specified targeted segments on each round sheet / personal digital assistant (PDA).
- By targeting specific segments, some poor recycling households in other areas may be missed.

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Advantages and disadvantages (continued)

Method three - Collection crew knowledge

Advantages:

- Using collection crew knowledge further targets specific areas of poor recycling and/or food waste capture performance beyond what is possible with the blanket and segmented approaches.
- Cheaper to implement than the blanket and segment approaches.

Disadvantages:

- Should the collection crew only be able to identify an area of properties which may be poor recyclers, this does not exclude those who are excellent recyclers but happen to live within the area of the group of households who are not.
- Crew knowledge of their rounds can vary dramatically dependant on how long they've been on their rounds for, whether they collect the same round every collection cycle, whether a high proportion of agency staff are used and whether they are engaged with the campaign.
- Collection crew's anecdotal knowledge may not always be reliable.

Method four – Individual bin inspections

Advantages:

- Straightforward method to undertake.
- Can be a zero cost method (although this is likely to only apply for in-house service arrangements).
- The most targeted approach of all the methods.
- Possible to collect evidence right from the start of the roll out (photos / note of date, time and type of recyclate present etc.).

Disadvantages:

- Only appropriate for individually presented bins / bags. Communally presented bins / bags cannot be easily identified by the crews.
- The most resource demanding method if additional resources (sub contractors or Waste Officers) have to be utilised to undertake the inspections of every single individually presented bin / bag.

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Advantages and disadvantages (continued)

Method four – Individual bin inspections

Disadvantages (continued):

- Collection crews can negatively perceive this method as giving them more work to do. In the most severe cases, trade union involvement can take place (early campaign engagement with these stakeholders is critical in reducing this risk) and/or the collection crew may not accurately record instances of non compliance.
- Health and safety procedures may prohibit crews opening the top bag contained within the bin to visually identify whether any recyclate is present, therefore crews would have to rely on aural methods to identify recycling present, the results of which may be misleading.
- Outsourced contractors could request a variation order to the contract (and request additional costs) for undertaking visual checks.

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Case study – Greater Manchester WDA

- Greater Manchester’s new five year communications and behaviour change [strategy](#) (launched in July 2018) used a mix of market segmentation and a blanket approach (for specified Districts within Greater Manchester) to target the relevant households.
- The strategy comprised tailored communications and content, using different approaches for targeting and delivering messages.
- Delivery plan broadly divided into:
 1. Campaigns
 2. Content
 3. Education

1. Campaigns:

Segment approach:

- Segmentation approach focussed on profiles of neighbourhoods, characteristics towards recycling and the material types targeted, based on capture and contamination rates
- Separate campaign for specific messages undertaken, including monitoring of key measures such as:
 - Number of loads of recycling rejected
 - Number of events delivered
 - Number of visits to campaign websites
- Qualitative data measured through delivering focus groups

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Case study – Greater Manchester WDA

Campaigns are a mix of blanket and targeted approaches with set timescale and budget limits. For instance:

Blanket approach:

- Two District Councils with high-contamination rates were pre-selected for the blanket approach (based on research and surveys).
- Included direct mail of service information leaflet, developing collection crew and call centre communications plan, providing bin stickers for bins and holding community events supported by delivering advertising, digital and educational crew training packages.

Targeted approach:

- Collection round based segmentation across the remaining District Councils.
- Used for both mixed recycling or specific material types.
- Based on the 'Right Stuff Right Bin' campaign.

2) Content:

- Content was tailored through various media:
 - Greater Manchester publications
 - Targeted rounds through local bus banners
 - Multiple digital platforms
 - Council information sources – call centres, collection calendars and leaflets

3) Education:

- Educational messages were delivered through multiple channels:
 - Permanent education administration staff employed
 - E Learning online training modules were made available for staff
 - Visits and public platforms to cover formal education, community groups and members of public were carried out
 - Work with external stakeholders such as landlords and housing associations began

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Communicate with household (first occurrence of not separating all recycle)





Introduction

Depending on which method has been chosen, communicating with households regarding the first occurrence of recycling and/or food waste being present in the residual waste bin can take the form of sending an educational letter, undertaking some [door knocking](#), or both. You can use any of the following four methods for targeting households (or a combination of them) as identifying specific households who are presenting recycle and/or food waste in the residual waste stream doesn't have to be undertaken until the second stage (although it can form the first stage, as with method four, below). In all instances, the tone of the communication must be one of education.

Method one – Blanket approach

Every resident has an educational letter sent to them which outlines the local authority's expectation that no items which can be recycled at the kerbside are put in the residual waste bin.

Method two – Segment approach

Only residents residing in particular chosen segments are sent an educational letter and/or have door knocking activities undertaken (if available).

Details are kept on the local authority's CRN system, which records the households which have been sent educational letters and / or received a house visit. These are updated on the relevant collection crew's round sheets / PDA system.

Method three - Collection crew knowledge

[Educational letters](#) and/or Waste Officer led house visits are undertaken in specific areas within each round which have been identified by the collection crew as being poor recyclers.

Records are kept on the local authority's CRN system as to which households have been sent educational letters and / or received a house visit. These records are also uploaded on the relevant collection crew's round sheets / PDA system.

Method four – Individual bin visual inspection

Educational letters and/or Waste Officer house visits are undertaken at each household specifically identified as having some recycle present in their residual waste bin.

Records of which households are presenting recycling and/or food waste in the residual waste bin are noted down on the round sheets / PDA at the point of collection. These details are then transferred to the local authority's CRN system so that both systems reflect the same information.

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Advantages and disadvantages

Method one – Blanket approach

Advantages:

- The blanket approach could enable other service information to be disseminated in the educational letter – scheme information, collection date reminders, what goes where, etc.
- Should customer services receive enquiries from residents about the letter, the communication to them is identical and should easily be resolved without the need for complaint escalation.
- Maximises the opportunities to see and opportunities to hear about the campaign.

Disadvantages:

- Evidence is not possible to collect, reducing the number of times evidence can be collected prior to formal action being taken.
- Residents may realise that their neighbours have received the same educational letter which may lower the impact of encouraging residents to change their behaviour.
- Educational letter is likely to be addressed to “Dear Resident” which can encourage residents to immediately discard the letter without reading it
- Blanket approach makes door knocking difficult – where would you target your resources (if you were solely adopting a blanket approach and not using another type of approach)?
- Can create a sense of resident distrust of the council because they could view the educational letter as a waste of money or that the council are snooping on their privacy

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Advantages and disadvantages

Method two – Segment approach (e.g. ACORN / OAC)

Advantages:

- Reduces the number of households receiving an educational letter which is likely to reduce the number of complaints received.
- Is a more targeted approach than the Blanket approach and so may enable some door knocking to be undertaken in target areas within the segment(s) chosen.

Disadvantages:

- Segment areas may be too large to door knock effectively and therefore only partial door knocking may be possible – where would you best target your resources?
- You are not necessarily targeting all poor recyclers because they may not all necessarily live in the targeted segment areas, therefore there is the potential for communications efforts to be targeted at a reduced level of effectiveness.
- Reduces the range of awareness of the campaign.

Method three - Collection crew knowledge

Advantages:

- Bespoke door knocking enables minor physical barriers to recycling and food waste to be quickly overcome. For example, the Waste Officer door knocking can order replacement / additional recycling containment where necessary on behalf of the residents who may not get around to doing so.
- Door knocking should be supported by a hand delivered, dated, educational letter, should the door not be answered when the Waste Officer calls. This can carry more gravitas which can encourage behaviour change compared to a blanket letter sent in the post.

Disadvantages:

- Reduces the range of awareness of the campaign.
- Door knocking is time consuming and may require additional resources to be deployed in the early weeks of the campaign.
- Residents notoriously don't answer the door during the working day, so some evening and weekend door knocking activity is advisable.

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Advantages and disadvantages

Method four – Individual bin inspections

Advantages:

- The most targeted approach, allowing only households who have been evidenced as having recyclate contained in their residual waste bin to receive an educational letter and/or house visit.
- Most effective and efficient method of conducting a door knocking campaign, only visiting those households who are known not to be compliant.

Disadvantages:

- Reduces the range of awareness of the campaign.
- Collection crews can negatively perceive this method as giving them more work to do. In the most severe cases, trade union involvement can take place (early campaign engagement with these stakeholders reduces this risk) and/or crew may not accurately record instances of non compliance.



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Key points to include in the educational letter

- Address the letter 'Dear Resident' and include the date (not just the month and year).
- Thank the household for their recycling efforts.
- Clearly set out the behaviour change campaign, its aims and objectives.
- The tone of the letter should be educational only. It should also refer to any change in policy and its implications, for example, that a statutory notice is the next step (in a two-stage process).
- Include key scheme information such as what recycling containers households should have (and how many they are entitled to) as well as contact numbers for ordering new / replacement containers.
- Including 'what goes where' information helps to educate residents who may put recycling and/or food waste in the residual waste container because they think it can't be recycled and/or those residents who may put non-recyclable items in the recycling containers because they think it can be recycled but it can't.
- Include website addresses for checking the waste and recycling collection days.
- Use images and infographics in preference of text.
- Keep the letter to one side of A4 only. Any more and it reduces the chance of being read.
- Include the council's contact details (customer services number).
- Include the waste and recycling scheme service information leaflet along with the leaflet, where this is available.

Advisory:

To increase the likelihood of the educational letter being read, local authorities may wish to include coloured or otherwise highlighted writing on the envelope of the educational letter and to use wording that draws the reader to the importance of reading the letter.

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Second occurrence of households who are not separating all their recycling



Introduction

Identifying the second occurrence of households who have been found not to separate their recycling and/or food waste from the residual waste stream is the second on-the-ground event when rolling out a behaviour change campaign. Identifying which households may be placing recycling and/or food waste in their residual waste container on the second occurrence is undertaken by conducting individual bin inspections, either by the collection crew or, where funding allows, by sub-contractors and/or Waste Officers.

Staff continue to follow the operational procedures identified in the first occurrence process of undertaking individual bin inspections. Records of the second occurrence are recorded against relevant properties on the round sheets / PDA who have already been recorded as receiving the educational letter. Records of the first occurrence are also recorded where properties are not recorded on the round sheets / PDA as having already received an educational letter.

At the end of each collection crew's working day, the information contained on the round sheets / PDA are uploaded onto the council's CRM system. The CRM system is checked daily by a Waste Officer for new information relating to the campaign

being uploaded. Where first occurrences are newly recorded, educational letters and/or door knocking activities are arranged and this activity is recorded on the CRM system.

Where second occurrences are newly recorded, an informal action letter is sent and / or hand delivered by a Waste Officer, along with door knocking activity, where possible. This action is subsequently again recorded on the CRM system, along with the date and time of the visit.

Local authorities may choose to repeat stage one (i.e. issue a second education letter) before issuing an informal action letter.

Best practice:

When staff record the second occurrence of recycling and/or food waste being present in the residual waste stream, it is highly beneficial to take a photo showing the recycling / food waste present in the residual waste bin / bag and the accompanying property. This must be uploaded onto the CRM system as evidence. This can help with any enforcement activity undertaken later on.

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Key points to include in the informal action letter

- Address the letter to 'Dear Resident', unless a name is known, in which case this should be used, and date it (not just the month and year).
- The letter should be titled 'Informal action letter'. This will help refer back to which letters have been sent in future communications and will help customer service colleagues identify at what stage the resident is at, should they receive a call.
- Clearly set out the behaviour change campaign, its aims and objectives.
- State that staff have observed recycling and/or food waste present in the residual waste stream (and the date that this was identified) and that all recycling / food waste must be contained in the relevant kerbside recycling receptacles (list which these are and give 'what goes where' details).
- The letter must include a notice which is served on the household which sets out their duties to separate their waste under section 46 of the Environmental Protection Act 1990. How the council expects them to comply with this requirement must also be clearly set out.
- The informal action letter must give a time limit for compliance. A Fixed Penalty Notice (FPN) can only be considered once a written warning has been served and either the person served with the warning fails to comply with any time limit or commits a similar breach within one year of the written warning.
- State that should recycling / food waste be found in the residual waste stream within this timeframe then formal action may be taken, which may include the issuing of an FPN. The letter must also state that the person served with the notice has a right to appeal to a tribunal within 21 days.
- The tone of the letter should remain informative.
- Include website addresses for checking the waste and recycling collection days and/or provide these in the letter (where possible).
- Include the council's contact details.

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Key points to include in the informal action letter



Best practice:

To increase the gravitas of the informal action letter it is useful for the recycling materials / food waste found in the residual waste stream to be stipulated in the letter. Where possible, an accompanying photo of the recyclate / food waste in the receptacle in front of the accompanying property should also be included.

If any recycling evidence is found which links a particular member of the household to the residual waste bin (a letter addressed to an individual, for example) then this should be photographed and recorded. All correspondence should then be sent to this individual, which will make it harder for them to contest any future FPN which may be issued. This must be uploaded onto the CRM system as evidence.



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Third occurrence of households who are not separating all their recycling



Introduction

Identifying the third occurrence of households who have been found not to separate their recycling and/or food waste from the residual waste stream is the last on-the-ground event when rolling out a behaviour change campaign, before enforcement commences. Identifying which households may be placing recycling / food waste in their residual waste container on the third occurrence is undertaken by conducting individual bin inspections, either by the collection crew or, where funding allows, by sub-contractors and/or Waste Officers.

Staff continue to follow the operational procedures identified in the second occurrence process of undertaking individual bin inspections. Records of the third occurrence are recorded against relevant properties on the round sheets / PDA who have already been recorded as receiving the educational letter and the informal action letter. Records of households committing the first and second occurrences are also recorded where properties are not already recorded on the round sheets / PDA as having already received an educational letter or informal action letter.

At the end of each collection crew's working day, the information contained on the round sheets / PDA is uploaded onto the council's CRM system. The CRM system is checked daily by a Waste Officer for new information relating to the campaign.

Where first or second occurrences are newly recorded by staff, educational / informal action letters and/or door knocking activities are arranged and this activity is subsequently again recorded on the CRM system.

Where third occurrences are newly recorded on the CRM system, a formal action letter is hand delivered by a Waste Officer or an Enforcement Officer. This action is subsequently again recorded on the CRM system, along with the date and time of the visit.

Best practice:

When staff record the third occurrence of recycling / food waste being present in the residual waste stream, it is highly beneficial to take a photo showing the recycling / food waste present in the residual waste bin / bag and the accompanying property. If any recycling / food waste evidence is found which links a particular member of the household to the residual waste bin (a letter addressed to an individual, for example) then this should be photographed and recorded, which will make it harder for the householder to contest any future FPN which may be issued. This must be uploaded onto the CRM system as evidence.

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Key points to include in the formal action letter

- Wherever possible, the letter must be addressed to a named individual in the household whom evidence has shown has committed the offence.
- Where a named individual is not known, the letter should be addressed to the householder. This is 'The head of the household. The occupier of a house.' according to the Law Dictionary.
- However, it should be noted that should all members of the household subsequently deny any wrong doing then an FPN will be unable to be issued as this must be delivered to a named individual.
- The letter should also be dated (not just the month and year).
- The letter should be titled 'Formal action letter'. This will help refer back to which letters have been sent in future communications and will help customer service colleagues identify at what stage the resident is at should they receive a call.
- State that staff have observed recycling and/or food waste present in the residual waste stream on two previous occasions (providing the dates of this and supporting photos, where available) and that this is a contravention to the notice served on them in the informal action letter. The council can decide:
 - a) whether this letter is the final warning letter and an FPN is sent if recycling / food waste is found in the residual waste stream on the fourth occurrence; or
 - b) whether the council will issue an FPN as part of the formal action letter.
- Where this letter will also issue an FPN, a payment date must be included. The person served with the notice has a right to appeal to a tribunal.
- If this letter forms an FPN, it must be issued by an Enforcement Officer.



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Case study – Mid Devon District Council

Compulsory recycling with an enforcement approach:

- Mid Devon introduced a compulsory recycling [policy](#) in November 2016.
 - The council's 'four steps to rubbish and recycling' policy uses enforcement as a "last resort against persistent offenders".
 - The policy is aimed at those "who insist on not recycling".
 - No action will be taken if the bins are used by carers or if source of waste or recycling is not identified by the Waste Officer.
 - When no action is taken, recycling information will be provided to all households in the area.
- If the bin where non-compliance is known can be identified to a household:
 - The frequency of offence will be monitored over the next three consecutive collections.
 - A Waste Officer will visit the resident on all occasions.
 - First warning and recycling information issued during the first visit.
 - Section 46 notice (under the Environmental Protection Act 1990) served on the second visit, with recycling information provided.
 - Non-compliance of the notice served on the third occurrence results in a FPN being issued.
 - Prosecution to follow if FPN is not paid within the stipulated time frame.

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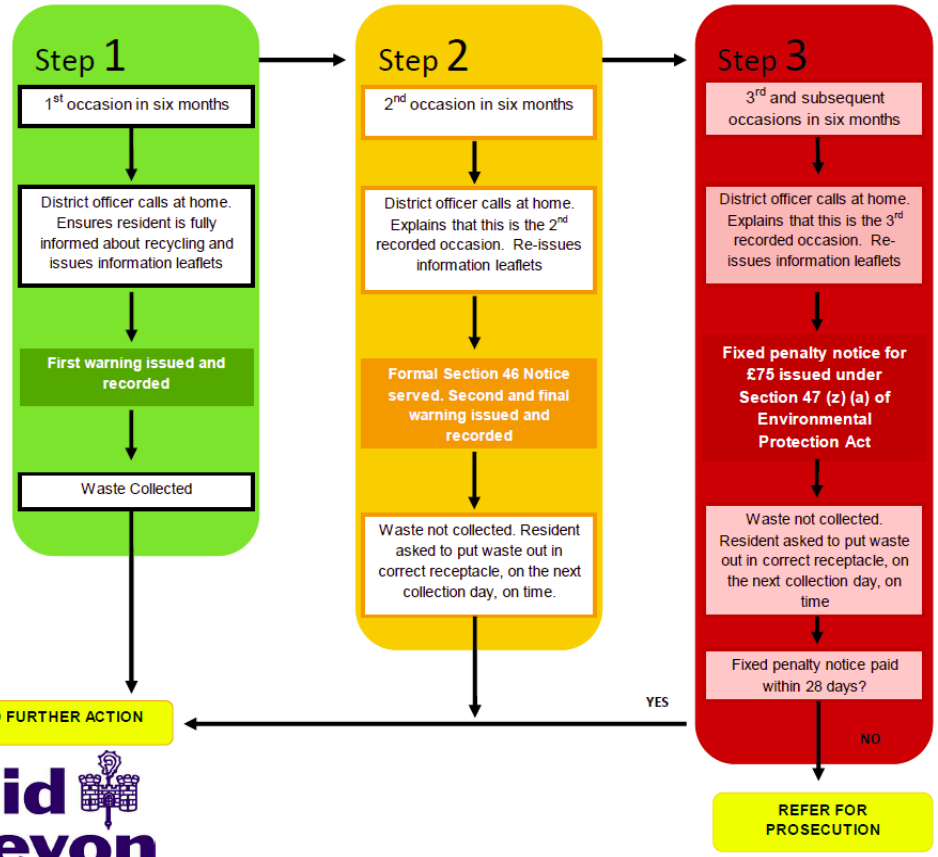
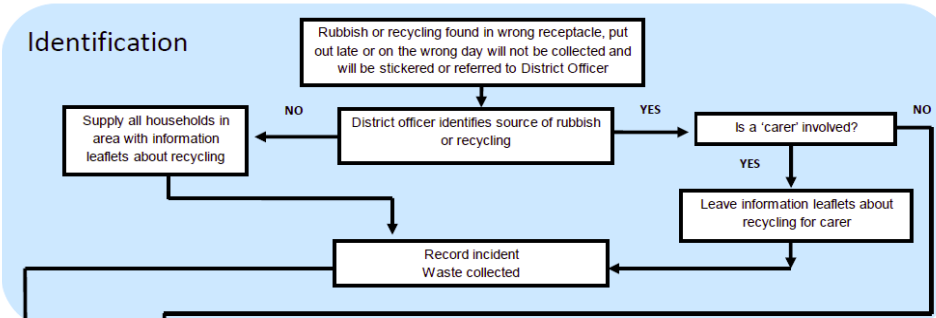
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Case study – Mid Devon District Council

The Mid Devon enforcement policy follows the following process. Step 3 is for persistent non-recyclers who put the wrong material in the wrong receptacle or put the bin out on the wrong day.



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Enforcement team
commence
investigation





Introduction

Prior to considering issuing a FPN, individual local authorities must discuss and agree the circumstances which are likely to warrant the use of a FPN. This may include:

- The seriousness and prevalence of the offence.
- Any explanation offered by the householder.
- The past history of the householder.
- The likelihood of the resident being able to demonstrate extenuating circumstances.
- What type of action is deemed appropriate or effective.
- Whether there has been flagrant disregard for the condition of the local environment.
- Advice from the council's Legal Department.

The following circumstances are likely to warrant the use of a fixed penalty:

- An Enforcement Officer has witnessed recycling / food waste being presented for collection in the residual waste stream by a householder and has therefore failed to comply with the Section 46 notice.

- An Enforcement Officer believes that there is sufficient evidence that a householder has placed recycling / food waste in the residual waste stream following the serving of a statutory notice and has therefore failed to comply with the Section 46 notice.
- There is a suitable witness (or witnesses) to a householder putting recycling / food waste in the residual waste stream and the householder responsible can be clearly identified and has therefore failed to comply with the Section 46 notice.

Action taken under legislation should only be conducted by authorised officers who are suitably experienced, trained and competent. Authorised officers should carry identification as proof of their authorisation and to what legislation their authorisation relates. In most circumstances, an Enforcement Officer is the authorised officer responsible for issuing FPN's on behalf of the council and the legislation the FPN is issued under is section 46 of the Environmental Protection Act 1990.

Therefore, the behaviour change campaign communications plan will need to address how the enforcement team will be kept up to speed with the progress of each stage of the campaign so that they are able to take timely action when it is needed.

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Fixed Penalty Notice (FPN) key information

A Waste Officer will need to inform the enforcement team at the appropriate point where they issue either the informal action letter or the formal action letter (whichever letter precedes the issuing of the formal FPN). The CRM system should allow for Waste Officers to change the track of the relevant property's information from the waste team to the enforcement team, whereby the enforcement team can read all correspondence and evidence (where gathered) and can issue the FPN at the appropriate time.

When the Enforcement Officer is ready to issue the FPN, this must be done by hand delivery and the time it's posted should be recorded, along with a photograph of its posting, for evidence. A letter should accompany the FPN, which states:

- The householder's name and address, along with the date.
- The letter should be addressed to a named individual, where this is known.
- The letter should clearly state that an FPN has been issued on (specify the date) and that this is because (specify the recycling material(s) / food waste found in the residual waste stream).

- State the amount of the FPN (and, where this is not stated, £100 is the default amount) and any reduction that the council has decided to apply for payment received early within a specified timeframe (usually 14 days).
- Include the information outlining a resident's right to appeal to a tribunal and how this can be undertaken.
- Include a contact telephone number and a reference number for the resident to contact the council with.

Advisory:

Some Enforcement Officers wear body cams to record the delivery of the FPN (and any exchange with the householder)

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Behaviour change policy



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Introduction

The behaviour change policy pertaining to compulsory recycling and food waste recycling is the document that underpins the whole campaign. It is imperative that the policy has Member approval before the campaign is rolled out so that the campaign cannot be undermined. The aim of the policy is to set out the aims of the campaign and the parameters within which it will operate.

Key sections to include in the policy are:

- The aim of the policy;
- The background to the policy, including the legislative context of the policy;
- An introduction to the policy;
- Procedures in place;
- Authorisation;
- Complaints procedure; and
- The monitoring and review of the policy.

Example wording for each of these sections follows, for local authorities to use as a basis for their individual behaviour change policies, should they wish to do so.

Example policy wording

The aim of the policy

The aim of the behaviour change policy is to ensure that all the recycle and food waste collected is captured in the correct receptacles and not in the residual waste stream, to maximise recycling rates.

The background to the policy, including the legislative context of the policy

Welsh local authorities have been set stringent recycling targets (70% recycling and composting target by 2024-25). As this deadline approaches, finding ways of improving already high recycling rates (currently at an average of 66%) becomes increasingly difficult.

Under section 46 of the Environmental Protection Act 1990, the council can specify “the substances or articles which may or may not be put into the receptacles or compartments of receptacles of any description.”

Local authorities can serve a notice on householders to comply with this legislation and issue a Fixed Penalty Notice (FPN) if this is not adhered to.

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Example policy wording

An introduction to the policy

It has been recognised that there is a need for a consistent approach to ensure that recycling and food waste are kept out of the residual waste stream. It is necessary to identify those households who repeatedly present their recyclate and/or food waste in the residual waste stream despite educational based action by the local authority to change this behaviour. In those instances, enforcement action may need to be sought, often as a last resort in encouraging behaviour change to be adopted.

Procedures in place

After the identification process has taken place, the council will provide advice and education to these households through implementing a three-stage approach:

1. Sending an educational letter and conducting a house visit where appropriate to do so.
2. Sending an 'informal action' letter and conducting a house visit where appropriate to do so.
3. Sending a 'formal action' letter, potentially including a FPN for failure to comply with the notice served as part of the informal action letter.

Authorisation

Only officers who are authorised by the council may undertake certain aspects of enforcing the policy. This may include the signing and serving of notices. Such authorisation is given through a scheme of delegation. Action taken under legislation to which this policy applies will only be conducted by such authorised officers who are suitably experienced, trained and competent. Authorised officers will carry identification as proof of their authorisation and to what legislation their authorisation relates.

Complaints procedure

The Council has a formal complaints procedure which ensures that any complaint is dealt with quickly, consistently and helpfully. Complaints can be made in writing or by telephone, email or by completing a complaint/suggestion form online.

The monitoring and review of the policy

This policy will be monitored and reviewed to ensure that any changes in legislation, guidance or other circumstances are considered which may affect the principles contained within this document. This process may also include consultation with the groups affected by this document; including local issues to ensure best practice.

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Case study - London Borough of Barnet

Compulsory Recycling Policy

The council's Household Recycling and Waste [Policies](#) released in September 2018 stipulate a compulsory recycling policy. Materials that cannot be put into the residual bin are specified on their [website](#).

Policy 16 states that receptacles with the wrong materials placed in them will not be collected.

Policy 17 stipulates that if bins are found with the wrong material in them at the time of collection:

- Residents would be notified of the breach with the help of a sticker or hanger placed on the bin; and
- The bin will only be emptied on the next collection day, once the incorrect material has been removed; or
- The bin will only be emptied before the next collection day once the incorrect material has been removed and a stipulated charge has been paid.

- While the policy does not specify any enforcement action, it does refer to the S46 of the EPA 1990 and its power to stipulate what can and cannot be placed in waste receptacles.

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Introduction

Door knocking (also called door stepping) is an important part of any behaviour change campaign. It enables the person door knocking to:

- Present the behaviour change campaign in an engaging manner, outlining the policy and what it means for the householder.
- Immediately ascertain what the barriers may be to the household recycling effectively.
- Arrange for any additional / replacement recycling / food waste containers to be delivered.
- Answer any questions or queries and myth bust.

Keep a record of each visit, including the date, property street and number, what was given out (e.g. containers and leaflets) and any further requests (assisted collection request / additional capacity request etc.). This is not only valuable evidence to collect and record on the internal system should any issues arise with the householder in the future, but also an excellent customer service exercise, creating a good impression of the council where previously there may not have been one. This can help residents engage effectively with the campaign as they come to understand what the council is doing and why they are doing it.



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Disadvantages

However, there are also disadvantages to door knocking:

- It is a costly exercise and the rate at which the person makes contact averages three to five households per hour, assuming that people answer the door. The area that a door knocking exercise can cover over a specified period of time is therefore limited.
- Door knocking ideally needs to be done at different times of the day, early evening and weekend to ensure a high answer rate at the door. This is expensive to undertake and, overtime, may need to be paid for evening and weekend work, depending on who is carrying it out.
- Effective door knocking requires a vehicle, a supply of service and information leaflets, a stock of replacement recycling and food waste containers, PPE and risk assessments to be carried out and potentially staff recruitment. It is therefore not an engagement technique that can be implemented quickly.
- Door knocking requires detailed training as the types of questions posed by householders often covers a wide range of waste management issues which will need to be effectively answered for the householder to maintain faith in the aims and objectives of the campaign. This can be time consuming to undertake.



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Overview

'Side waste' is additional waste presented next to, or on top of, the residual waste bin, with or without the lid open or additional bags presented over and above the number of authorised residual waste bags. The creation of this additional waste should be largely preventable as long as the local authority has ensured that sufficient residual waste capacity has been allocated to each household for non-recyclable and food waste (and also taking into account those with medical needs, a disability and/or children/adults in nappies).

Accepting side waste should be discontinued prior to rolling out a campaign to increase recycling, or should be the starting point of the behaviour change campaign.

Household waste for which local authorities may make a charge (for collection but not disposal) under section 45(3) of the Environmental Protection Act 1990, includes any article that:

- exceeds 25kg in weight; or
- does not fit or cannot be fitted into a receptacle for household waste provided by a Welsh waste collection authority or, where no such receptacle is provided, a cylindrical container 750mm in diameter and 1m in length; or
- is garden waste.



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Case study – Bolton Council

- Bolton Council’s enforcement policy for domestic waste receptacles was [approved](#) in 2009 and [updated](#) in 2016.
- Sections 3 and 4 of the 2016 report provides an update on the changes to the section 46 of the EPA 1999.
- The report emphasises the need for education and awareness activities before resorting to enforcement for waste offences.
- The policy stipulates that a written warning should be given with a specified time frame for improvement, if non-compliance is continuing.
- If the householder fails to comply with the S46 notice then a “notice of intent” is served (containing specified information, including the right to make representations within 28 days).
- “Final notice” or FPN served thereafter.
- The policy specifies the conditions which must be met before issuing a FPN:
 - Written warning and person fails to comply within time limit, or
 - Person commits breach within one year of written warning.
- FPN is reduced to £40 if paid within 14 days (optional discounted early repayment).

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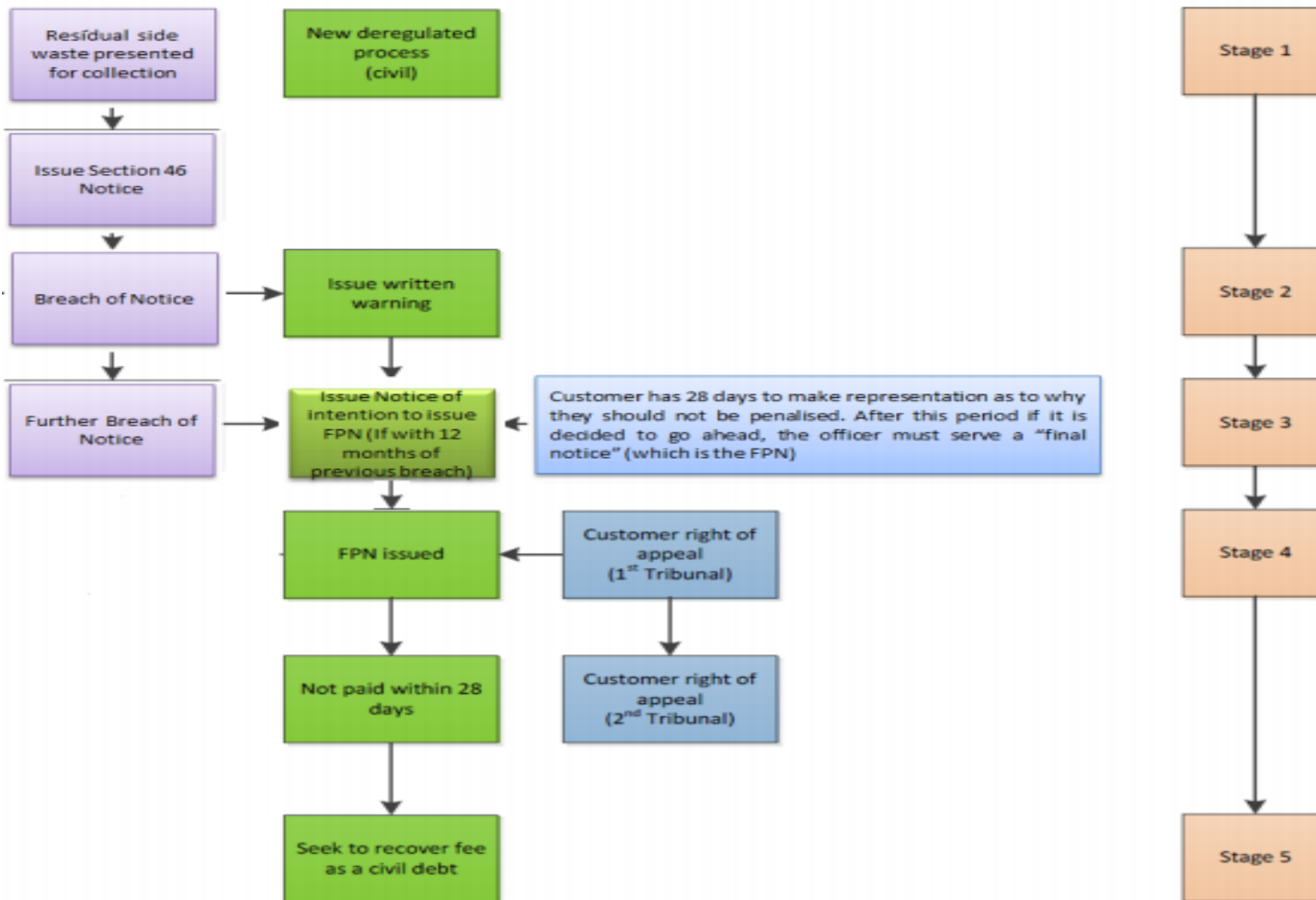
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Bolton Council's side waste process



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Overview

Local authorities can take further measures to reduce the amount of recyclables and food waste present in the residual waste stream by ensuring that when larger capacity / additional residual waste bins are issued, for example to those households with children in nappies, checks are made on an annual basis to ensure they still require the additional capacity. Whilst this is a smaller issue, it is an important procedure to adopt to ensure that households remain incentivised to put the right material in the right bin.

Monitoring larger / additional residual waste bins issued on a temporary basis, and ensuring that these are rescinded when appropriate to do so, is the key in ensuring that recyclable and food waste are kept out of the residual waste stream as far as practicable.

The broad procedures to follow when considering offering additional waste capacity should include the following:

- Identify how to decide what additional residual waste capacity could be offered, for how long and in what circumstances (and ensuring the procedure is compliant with council policy);
- Undertake a house visit or telephone interview to determine individual household need;

- Produce an Additional Waste Authorisation Form which sets out the information necessary to obtain for each household who has been authorised with additional capacity (including the name, address, current residual waste and recycling capacity, reason for and expected duration of the additional capacity requested, date this was granted or refused and reasons why, plus whether a bin audit was undertaken which may identify recyclate in the residual waste stream prior to additional capacity being authorised, of which removal would enable the current capacity to be sufficient);
- Keeping records up to date with follow up visits / telephone interviews in periodic instances (advise once a year in cases which are not time bound, such as with children in nappies);
- The methods utilised to remove the additional capacity offered when there is no longer the need for it, including the communication requirements.

These procedures do not require specific enforcement input as they are usually individual agreements made between the householder and Waste team. The local authority also usually retains ownership of any bin(s) issued and so can therefore usually remove additional capacity if necessary.

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Monitoring and evaluation

Monitoring and evaluating scheme performance is something that all local authorities should be doing as a matter of routine. Not only does it enable you to assess whether schemes are performing as expected, it also helps diagnose problems, design new approaches and ultimately improve efficiency and effectiveness. WRAPs document gives you practical advice on how to go about monitoring the performance of your schemes.

Good monitoring and evaluation can be used to improve your service, scheme or communications campaign. Wraps provides guidance on:

- What to monitor
- When to monitor, with timings and a phased programme
- Defining aims and objectives with details of input, outcome and impact objectives
- The importance of SMART objectives and KPIs
- The monitoring process, data gathering, comparison and analysis
- Planning your monitoring and evaluating the results
- Identifying potential for data interpretation to enable service / scheme improvement and the setting of future priorities
- Suggested sources of further help and advice

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Monitoring and evaluation

There are three different types of objectives that can be set to help you monitor and evaluate communication activity.

Input objectives are those that describe what will be done, and are therefore a measure of your effort. Examples include:

- To measure how many opportunities have been created for people in the target population to see or hear the communication message(s).
- To measure how many leaflets have been distributed during the communications campaign.
- To measure the outcomes of the communications campaign on understanding / recognition of campaign materials by a certain date.

Outcome objectives are those that describe a change that must happen as a result of communications. Examples include:

- To measure residents' understanding of the materials collected at kerbside before and after the communications campaign.

- To measure residents' satisfaction with the services before and after the communications campaign.
- To measure the outcomes of the communications campaign on understanding / recognition of campaign materials] by a certain date.

Impact objectives are those that describe what the ultimate result of communications should be. Examples include:

- To measure the recycling rate (e.g. increased recycling rates; decreased residual waste).
- To measure the recycling rate in a particular area before and after the communications campaign.
- To measure the tonnage of the dry recycling kerbside collection before and after the communications campaign.

All three types of objectives should be considered when planning to monitor and evaluate communications, as they are useful for different purposes. However, some measurement of impact is essential.

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