

Recycling Risk Register

Appendix 1

| Ref | Risk Description | Potential Impact | Inherent Risk | | | Current Controls | Residual Risk | | | Proposed Management Actions | Target Risk Rating | | | Risk Reduction Target Date | Owner | Key Indicators / Measures (list the key metrics / indicators used to monitor the risk) |
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| | | | Likelihood | Impact | Priority | | Likelihood | Impact | Priority | | Likelihood | Impact | Priority | | | |
| 1 | Loss of environment permits due to not meeting the permit obligations to operate recycling and processing facilities. | <ul style="list-style-type: none">• Strategic failure• Financial impact• Service delivery failure• Community impact• Environmental impact• Stakeholders impact• Reputational• Legal and regulatory failure | B | 1 | High - Red | <ul style="list-style-type: none">• Separate licenses for landfill, MRF and HWRCs.• COTC holders manage the permit activities on site• Regular NRW inspections and ongoing engagement• Control processes< BSI accreditation ISO:9001 2015 Quality Management Standards and training• Pas402 Accreditation on HWRC Recycling Centres• Duty Manager cover during out of hours to co-ordinate an emergency response should there be an incident• Interim manager responsible for all site permits• Quarterly review of statutory reporting requirements to regulatory bodies to ensure that they are met within required timescales | D | 1 | Medium - Red / Amber | <ul style="list-style-type: none">• Review business continuity arrangements to ensure there is a contingency in place - Q2 2022/23 | D | 2 | Medium - Red / Amber | Q2 2022/23 | G Harris | <ul style="list-style-type: none">• Number of statutory reporting requirements to regulatory bodies not met within required timescales• Major non-conformance during scheduled/non-scheduled visits by NRW |
| 2 | Failure of infrastructure resulting in discharge from landfill into water course. | <ul style="list-style-type: none">• Strategic failure• Financial impact• Service delivery failure• Health and safety failure• Partnership failure• Community impact• Environmental impact• Stakeholders impact• Reputational legal and regulatory failure | A | 2 | High - Red | <ul style="list-style-type: none">• Leachate monitoring stations to ensure that leachate levels in surface water remain within agreed levels• Good working relationship with NRW• Duty manager rota to ensure point of contact for emergencies 24/7• Regular inspections from regulatory bodies• Engage with specialist landfill contractor to assess source of any spillage | C | 2 | Medium - Red / Amber | <ul style="list-style-type: none">• Ensure leachate pumps are fully functioning and agree a scope of works to remediate the issue of the pumps not being fully functional Q4 2021/22• Conduct a review of existing permits to ensure that permit reflects current usage of the site. Q4 2021/22• Ensure aftercare maintenance is completed in line with permit requirements Q4 2021/22 | D | 2 | Medium - Red / Amber | Q4 2021/22 | G Harris | <ul style="list-style-type: none">• Number of non-conformances issued• Number of Leachate spills |
| 3 | Loss of use of MRF property due to fire. | <ul style="list-style-type: none">• Financial impact• Service delivery failure• Health and safety failure• Environmental impact• Reputational damage | C | 1 | High - Red | <ul style="list-style-type: none">• Business continuity plans in place including use of alternative office base for office staff• Insurance in place to fund increased costs of working• Fire alarm and suppression systems in place, maintained and tested, pumps in WTS, silver rota - New fire trace system in MRF• Enhanced physical inspections by out of hours by security guards• CCTV in place in high-risk areas, such as the tipping hall, and is monitored 24/7• MRF procedures in place for disposing of waste such as disposing of oldest waste first• Educational communication with the public regarding correct disposal for waste• Dedicated storage bays to separate the waste to contain fires.• Regular fire drills are carried out | D | 1 | Medium - Red / Amber | <ul style="list-style-type: none">• Review the current fire prevention plan. Q4 2021/22• Introduce an automated fire suppression system by monitoring fire hotspots. Q2 2022/23 | C | 3 | Medium - Amber / Green | Q2 2022/23 | G Harris | <ul style="list-style-type: none">• Number of fires reported• Number of smoke incidents |
| 4 | Disruption to service delivery due to industrial action. | <ul style="list-style-type: none">• Strategic failure• Financial impact• Service delivery failure• Health and safety failure• Partnership failure• Community impact• Environmental impact• Stakeholders impact• Reputational• Legal and regulatory failure | D | 1 | Medium - Red / Amber | <ul style="list-style-type: none">• Business continuity plans in place• Improving infrastructure through capital investment and working conditions• New service models have addressed roles and responsibilities• Staff and Trade Union consultations and ballots were carried out to workforce agreement to new shift patterns• Modernising the service and fleet - 4 day working• HWRC booking system introduced to ensure managed visitor numbers to the site to reduce staff pressures. It has had a positive impact on staff morale• New vehicles procured to improve reliability to enable staff to carry out their roles | E | 1 | Medium - Amber / Green | <ul style="list-style-type: none">• Reinstate regular local health and safety meetings with trade unions as and when Covid restrictions allow. Q1 2022/23• Ensure consistent approach by management team when applying policies and procedures through the introduction of regular meetings Q4 2021/2022• Implementation of the Recycling Strategy. Q2 2022/23 | E | 1 | Medium - Amber / Green | Q2 2022/23 | C Cutforth | <ul style="list-style-type: none">• No industrial relations issues• Number of proposals to Trade Union Branch Secretaries which are not supported• Successful implementation of Recycling Strategy |

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| 5 | Inability to carry out collection service due to supplier failure. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Community impact Environmental Impact Stakeholders impact Reputational Legal and regulatory failure | B | 2 | High - Red | <ul style="list-style-type: none"> Quarterly meetings to review supplier performance Procurement is carried out within in line with Council policy and procedures Emergency provision established to use contingency suppliers in the event of primary supplier failing Keep abreast of updates provided by APSE to be informed of market and industry knowledge | C | 3 | Medium - Amber / Green | <ul style="list-style-type: none"> Escalate non-performance to procurement lead to assist with implementing contingency measures Q4 2021/22 | C | 3 | Medium - Amber / Green | Q4 2021/22 | G Harris / M Long | <ul style="list-style-type: none"> Number of contracts not performing to expectation. Number of supplier defaults. Number of service delivery failures |
| 6 | Inadequate controls resulting in staff coming into contact with hazardous materials such as live ammunition, needles, asbestos, chemicals. | <ul style="list-style-type: none"> Service delivery failure Partnership failure Community impact Environmental Impact Stakeholders impact Health and Safety failure | B | 2 | High - Red | <ul style="list-style-type: none"> H&S action plan agreed with Corporate Health and Safety Team which have been created in consultation with Trade Unions Regular reporting and reviews with the Corporate H&S Team Mandatory hazard training for all front line employees COSHH assessments on all materials and relevent officers provided with appropriate training | C | 3 | Medium - Amber / Green | <ul style="list-style-type: none"> Carry out an internal review to ensure all risk assessments are current and uploaded onto RAMIS, to ensure all affected staff are briefed and signed off on processes relevant to their role. Q4 2021/22 To implement a system where risk assessments are reviewed following an incident/accident. Q4 2021/22 | C | 4 | Low - Green | Q4 2021/22 | M Long | <ul style="list-style-type: none"> No of significant incidents / accidents. Number of service failures resulting from accidents Number of documents which are RAMIS compliance |
| 7 | Reduction of temporary funding (FRM) resulting in a reduced service. | <ul style="list-style-type: none"> Financial impact Service delivery failure Health and safety failure Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | C | 2 | Medium - Red / Amber | <ul style="list-style-type: none"> Monthly budget reviews with finance Regular service reviews with management to ensure any resource funded by FRM is delivering in line with service objectives Ensure managers have full understanding of their budget through monthly meetings | C | 3 | Medium - Amber / Green | <ul style="list-style-type: none"> Ensure proposed restructures have enough resilience built into the base budget to reduce the reliance on temporary funding by working with finance to discuss alternative funding avenues. Q4 2021/22 | E | 3 | Low - Green | Q4 2021/22 | M Wakelam | <ul style="list-style-type: none"> Number of overspends against budget |
| 8 | Inability to process waste due to over capacity in MRF or due to MRF breakdown. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Environmental impact Stakeholders impact Reputational failure | B | 1 | High - Red | <ul style="list-style-type: none"> Daily maintenance carried out to machinery Assets management plan to monitor the life span of the equipment Contingency contracts in place in the event of being unable to use the MRF Adequate stock control to monitor the levels of material received vs. material processed. | C | 2 | Medium - Red / Amber | <ul style="list-style-type: none"> Carry out procurement exercise for additional processing facility Q4 2021/22 Carry out actions points following maintenance schedule review being conducted by management, to ensure preventative maintenance schedule reduces plant downtime Q4 2021/22 | C | 4 | Low - Green | Q4 2021/22 | M Long | <ul style="list-style-type: none"> Volume of materials sent to third party processors due to plant downtime or overcapacity. |
| 9 | Inability to deliver material to the incinerator (Energy from Waste Plant) under the Project Green Contract due to third party catastrophic plant failure. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | C | 1 | High - Red | <ul style="list-style-type: none"> Continuity plans form part of the contract waste treatment Regular stakeholder meetings to monitor performance of the contract | C | 2 | Medium - Red / Amber | <ul style="list-style-type: none"> Introduce a robust system to direct non-conformance waste after from incinerator | D | 2 | Medium - Red / Amber | ongoing | A Williamson | <ul style="list-style-type: none"> Number of contract failures |
| 10 | Inability to deliver material to the AD Plant under the Welsh Water contract due to third party catastrophic plant failure. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | C | 1 | High - Red | <ul style="list-style-type: none"> Continuity plans form part of the contract waste treatment Regular stakeholder meetings to monitor performance of the contract | D | 2 | Medium - Red / Amber | <ul style="list-style-type: none"> Implement an enhanced training programme for operatives to identify contaminated food waste | D | 2 | Medium - Red / Amber | ongoing | A Williamson | <ul style="list-style-type: none"> Number of contract failures |
| 11 | Failure to ensure robust procedures in place to prevent and detect fraud on disposal or sale of materials, loss of income or theft. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Industrial Relations Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | A | 2 | High - Red | <ul style="list-style-type: none"> Following detailed audit, recommendations have been built into site procedures to reduce opportunity of fraudulent activities taking place Mandatory training for fraud awareness rolled out across service area. Independent monitoring by finance team for all in/out tonnages. Corporate policy embedded into site induction for all employees | C | 3 | Medium - Amber / Green | <ul style="list-style-type: none"> Request a follow up internal audit. Q4 2021/22 | C | 3 | Medium - Amber / Green | Q4 2021/22 | G Harris | <ul style="list-style-type: none"> Number of financial and stock discrepancies |

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| 12 | Failure to ensure that adequate stock control records are maintained due to Weighbridge Failure including calibration issues. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | C | 1 | High - Red | <ul style="list-style-type: none"> Regular inspections and checks to validate stock records by business support team Annual calibration of the Weighbridge by supplier to ensure weighing accuracy Trading Standards carry out own tests to Weighbridge to ensure accuracy All tonnages in/out over the Weighbridge are validated and verified by finance. | B | 3 | Medium - Red / Amber | <ul style="list-style-type: none"> Begin procurement exercise to source new weighbridge software to introduce automation. Q4 2021/22 To ensure the next annual calibration is booked with supplier and undertaken, and that the latest certificate is displayed. Q4 2021/22 | C | 3 | Medium - Amber / Green | Q4 2021/22 | C Cutforth | <ul style="list-style-type: none"> Number of stock discrepancies greater or less than 10% |
| 13 | Failure to ensure correct H&S policies and procedures are implemented resulting in accidents and injury to employees and the public. | <ul style="list-style-type: none"> Strategic failure Financial impact Industrial Relations Partnership failure Community impact Environmental impact Reputational Legal and regulatory failure | B | 1 | High - Red | <ul style="list-style-type: none"> H&S action plan created with Corporate H&S and in collaboration with Trade Unions Regular reporting to H&S team, and HSE if incident is RIDDOR reportable CCTV provides full monitoring the site activities and is located on front line collection vehicle to aid with investigations Full H&S induction is carried out for new starters and PPE provided Supervision of activities across all areas of service Regular fire drills to raise awareness of fire evacuation Workplace first aiders deployed within operation hours Develop and implemented an enhanced induction for all new and existing employees. | C | 3 | Medium - Amber / Green | <ul style="list-style-type: none"> Develop vehicle/pedestrian risk assessment across all sites Q3 2021/22 Awaiting risk assessments to be uploaded to RAMIS before undertaking management review Q3 2021/22 | C | 4 | Low - Green | Q4 2021/22 | G Harris | <ul style="list-style-type: none"> Number of accident / Incidents Stats, near miss reporting. |
| 14 | Failure of management to ensure that regulatory compliance is completed to required standards and stipulated frequencies. | <ul style="list-style-type: none"> Strategic failure Financial impact Health and Safety Impact Partnership failure Environmental impact Stakeholders impact Reputational Legal and regulatory failure | C | 2 | Medium - Red / Amber | <ul style="list-style-type: none"> Assets plans outlining inspection regime to monitor inspection dates RAMIS compliance/monitoring to ensure regulatory responsibilities are met and provides a notification service to prompt the next inspection date Electronic paper-trail for record keeping ensuring that certificates are logged | D | 2 | Medium - Red / Amber | <ul style="list-style-type: none"> Management review to ensure inspection requirements are allocated to appropriate officer following restructure Q4 2021/22 Conduct a review to remove duplication of record of record keeping Q4 2021/22 | D | 3 | Medium - Amber / Green | Q4 2021/22 | M Long | <ul style="list-style-type: none"> Number of overdue events on relevant systems. |
| 15 | Reduction of income due to recycling market collapse leading to significant budgetary challenges. Glass, paper and cardboard are the main risks, however, plastics have become a high risk. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | B | 1 | High - Red | <ul style="list-style-type: none"> Monitor pricing fluctuations for recyclable material using industry standard journal such as Letsrecycle.com to ensure a realistic price for materials Work closely with processors to ensure material is processed in a timely basis to protect the authority from price fluctuations WDF work closely with processors to ensure there are no stock discrepancies and collate information to Welsh Government. | B | 2 | High - Red | <ul style="list-style-type: none"> Propose and introduce recycling strategy to remove contamination from the material streams. Q3 2021/22 Complete procurement exercise to ensure contingency is in place for alternative processors. Q3 2021/22 | B | 2 | High - Red | Q4 2021/22 | M Long / V Thorne | <ul style="list-style-type: none"> The amount of shortfall against income targets Price fluctuations for recyclable materials |

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| 16 | Inability to deliver service due to high sickness levels due COVID-19 pandemic. | <ul style="list-style-type: none"> Strategic failure Financial impact Partnership failure Community impact Environmental impact Stakeholders impact Reputational and regulatory failure | A | 1 | High - Red | <ul style="list-style-type: none"> Regular reviews between management and HR to discuss cases of sickness ensure that Corporate policies and process are followed and to highlight any further interventions needed Managers and HR make referrals to Occupational Health when needed Regular weekly meetings to review sickness cases. Ensuring sickness policy is consistently applied across the service Identifying patterns and addressing concerns. Monthly meetings with Head of HR and Director of Economic Development Management carry out early intervention such as adjusted duties if appropriate Adhere to COVID-19 corporate risk assessment which is updated to included latest government guidance Testing equipment available for staff to use as required. Staff information about flu hygiene communicated Enhanced cleaning regime of buildings and equipment in place Occupancy controls for office spaces / meeting rooms in place Staff provided with appropriate PPE and sanitisers. Business continuity arrangements in place | B | 3 | Medium - Red / Amber | <ul style="list-style-type: none"> Propose and introduce recycling strategy to remove contamination from the material streams. Q3 2021/22 Complete procurement exercise to ensure contingency is in place for alternative processors. Q3 2021/22 | B | 4 | Low - Green | Ongoing | G Harris | <ul style="list-style-type: none"> Corporate sickness targets Occupational Health referrals Number of COVID-19 sickness cases related to workplace transmission |
| 17 | Inability to deliver front line waste collections due to loss or curtailment of Operator licence by the Traffic Commissioner. | <ul style="list-style-type: none"> Strategic failure Financial impact Service delivery failure Partnership failure Community impact Environmental impact Stakeholders impact Reputational Legal and regulatory failure | C | 1 | High - Red | <ul style="list-style-type: none"> CTS monitoring compliance of driver performance and vehicle maintenance Driving license checks 6 monthly to ensure that drivers are legally able to drive vehicles Download drivers digital tachographs every 28 days to review driver infringements and agree corrective actions Carry out driver assessments to ensure that drivers are competent to drive vehicles Secondary Transport Manager identified and added to Operator License Ensuring Managers hold a CPC qualification to manage drives with HGV license | D | 1 | Medium - Red / Amber | <ul style="list-style-type: none"> Create a service led compliance team to monitor and address non-compliance. Q3 2021/22 Identify candidates to progress with their CPC qualification Q3 2021/22 | D | 3 | Medium - Amber / Green | Q3 2021/22 | J Hughes | <ul style="list-style-type: none"> OCRS (Operators Risk Compliance Score). Number of repeat infringements in relation to the OCRS |