### AGENDA MANAGEMENT SHEET

Report Title	Food Waste
Name of Committee:	Cabinet
Date of Meeting:	2 December 2024
Report Director	Chief Officer – Operations and Traded Services
Portfolio:	Operations and Traded Services
Ward Relevance:	All
Prior Consultation:	Portfolio Holder, Shadow Portfolio holder, Budget Working Group, Finance and Human Resources
Contact Officer:	Andy Kelly – Project Manager, Food waste
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:  (C) Climate (E) Economy (HC) Health and Communities (O) Organisation	This report relates to the following priority(ies): Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
	Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
	Residents live healthy, independent lives, with the most vulnerable protected. (HC)
	□Rugby Borough Council is a responsible, effective and efficient organisation. (O)      □Corporate Strategy 2021-2024
	☐ This report does not specifically relate to any Council priorities but
Summary:	This report seeks approval to spend Capital Funding grant from the Department for Environmental, Food and Rural Affairs and begin procuring food waste collection

vehicles and caddies. This is time sensitive due to protracted lead times for new vehicles and food caddies because of all local authorities embarking on similar exercises which will exert pressure on the supply chain.

#### **Financial Implications:**

Subject to approval within this report, capital budgets totalling £1.684m will be added to the GF capital programme for 2025/26 for food waste vehicles and caddies as detailed within Section 3. This will be financed by capital grants and internal borrowing.

## Risk Management Implications:

There is a likelihood of procurement bottlenecks which could create supply delays and impact the implementation timescales of a new service. Recent changes to the procurement legislation may have unknown impact on procurement process or the suppliers speed of processing.

The national recycling rate target of 65% is ambitious and it is unclear what, if any, sanctions there will be on local authorities that fail to achieve this level of recycling.

## Environmental Implications:

Please refer to the Climate Impact Assessment as per Appendix 2

## Legal Implications:

The implementation of a new, weekly food waste collection service to all households was deemed mandatory under legislation introduced through the Environment Act 2021, with an implementation date of 1<sup>st</sup> April 2026.

All procurements will follow and adhere to current guidance and legislation.

## Equality and Diversity:

Please refer to the Equalities Impact Assessment as per Appendix 1.

#### Options:

1. To provide the service as outlined in the report.

2.

#### Recommendations:

#### IT IS RECOMMENDED TO COUNCIL THAT:

Defer a decision to a later date.

- A general fund capital budget of £1.265m for the purchase of food waste vehicles be approved and added to the capital programme for 2025/26 to be financed by capital grants and internal borrowing as detailed in section 3 of the report; and
- 2. A general fund capital budget of £0.419m for the purchase of food waste caddies be approved and added to the capital programme for 2025/26 to be financed by capital grants and internal borrowing as detailed in section 3 of the report.

## Reasons for Recommendation:

To ensure compliance with the Environment Act 2021, the Council must prioritise the implementation of mandatory weekly food-waste collections.

To defer this decision to provide the service may attract yet unknown consequences from Defra and while these may incur fines or other sanctions there remains a risk of potential damage to the Council's reputation.

#### Cabinet – 2 December 2024

#### **Food Waste**

### Public Report of the Chief Officer - Operations and Traded Services

#### Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT -

- (1) a general fund capital budget of £1.265m for the purchase of food waste vehicles be approved and added to the capital programme for 2025/26 to be financed by capital grants and internal borrowing as detailed in section 3 of the report; and
- (2) a general fund capital budget of £0.419m for the purchase of food waste caddies be approved and added to the capital programme for 2025/26 to be financed by capital grants and internal borrowing as detailed in section 3 of the report.

#### **Executive Summary**

This report seeks approval to allocate capital funding and secure additional resources for the implementation of a weekly food waste collection service, as mandated by the Environment Act 2021. This is the first in a series of reports that will outline key components of the project, including a Communications Plan, details of revenue funding, and the necessary investment to reconfigure the depot to support the new food waste vehicles. This is a significant initiative requiring collaboration across multiple Council departments to ensure successful delivery.

This new legislation requires all councils to introduce a dedicated, weekly food-waste collection by 31 March 2026, with the goal of increasing recycling rates to the national target of 65% by 2035. Currently, Rugby Borough Council collects around 43,500 tonnes of waste annually, achieving a recycling rate of 43%, below the current national average of 46%. A targeted food waste service is expected to significantly reduce landfill contributions and increase recycling rates.

The Council's Waste Services team currently operates 14x collection rounds across 51,563 households and adding a food waste service will require additional vehicles, staff, and collection rounds. Initial funding from Defra of £1.070m has been allocated to support the capital costs of vehicles and food caddies. However, this funding does not fully cover all expected costs. Conversations with DEFRA on this are continuing and evidence has been provided to them demonstrating the need, but no response has been forthcoming to date.

This initiative will require an ongoing communications strategy to inform and engage residents across diverse communities, emphasising the benefits of the food waste collection service. Effective public engagement will be critical to the service's success.

The Council's mandatory obligation under the Environment Act 2021 necessitates swift action to meet the Government's deadlines and avoid potential penalties. Delays in procurement and high demand for waste collection resources present risks, including increased costs. Nonetheless, the Council's plan aims to ensure compliance, improve recycling performance, and meet statutory requirements by the target date of April 2026.

This project has been subject to numerous uncertainties around legislation, funding levels, a requirement for new waste collection routes and new collections staff, the need for a major logistical exercise for container distribution. These are issues which need to be managed in the project.

#### 1. Background

1.1 Rugby borough has a current property count of 51,563 domestic properties. Waste Services operate 14x collection rounds comprising of 6x residual black bins rounds, 5x recycling blue bin rounds and 3x garden and food green bin rounds. These are operated by 14x drivers and 28x loading operatives. Residents currently have three separate waste containers; the food waste service will add another two, one indoor and one outdoor food caddy.

Table 1

100.0			
Service	'Urban'	'Rural' households	Total
	households		households
Residual waste	44,617	6,946	51,563
Dry recycling	47,926	3,160	51,086
Mixed food &	25,000 subs	25,000 subscriptions across the	
Garden waste		borough	

- 1.2 The Council collects around 43,500 tonnes of waste each year and recycle around 19,700 tonnes or 43%. The national recycling rate is 46%.
- 1.3 The Environment Act 2021 was a response to a series of consultations around improving recycling in England and introduced several measures to raise the level of recycling to 65% by 2035.
- 1.4 As part of this regime councils must introduce a domestic weekly food waste collection by 1st April 2026 and have received a level of capital funding (Table 1) to support this.
- 1.5 This funding has been provided for the purchase of food waste collection vehicles and food waste containers. Further funding for transitional costs will be made available, but these funding levels are yet not known. Transitional funding will not cover changes such as depot design or layout. Further funding has been declared for the ongoing revenue costs of operating these new services and are expected from April 2026, but levels are not yet known.
- 1.6 To determine the levels of capital funding for each council, the Department for Environment, Food and Rural Affairs (Defra) used a calculation that considered the numbers of properties, existing food waste collections and predetermined vehicle collection capacities to calculate the number of vehicles needed and how many food caddies will be required.

- 1.7 This determined that Rugby Borough Council would require x7 additional food waste vehicles and provided capital funding accordingly. This number was arrived at using calculations from the 'Local Authority Portal' property-count, existing foodwaste collections within the borough and performance figures from councils already collecting food waste but was less than the requirement shown by our own modelling.
- 1.8 Capital funding was also allocated to provide two food caddies to all properties. This initial funding was challenged by officers and an increase was granted by Defra.

Table 2

Funding from DEFRA for capital £	Received
-£0.967m	11/04/24
-£0.102m	01/05/24
-£1.070m	

- 1.9 To challenge the calculations that Defra based their funding on, RBC utilised an external company, Waste and Resources Action Programme (WRAP) non-government organisation (NGO) that provide support to local authorities.
- 1.10 WRAP's calculations using their inhouse Kerbside Analysis Tool (KAT) determined that the council would need x9 food waste vehicles with a further x1 maintenance-spare in reserve. This was confirmed by using a specialised route-optimisation software company 'WebAspx' who created a set of new food waste collection routes that maximised efficiencies through the most productive way of completing rounds and minimising fuel usage to contribute to the council's carbon reduction.
- 1.11 The figures provided by Defra were challenged on the Council's behalf which outlined the shortfall in funding. An initial challenge generated additional funding which was insufficient and was challenged again. This second challenge has to date remained unanswered by Defra.

#### 2. Implementation

- 2.1 A dedicated Project Manager has been appointed to deliver the project.

  There may be a further need for additional support in the communications plan delivery and this will be determined accordingly.
- 2.2 Delivering a separate weekly food waste collection is a significant service change impacting all residents. Whilst the consequences of not delivering the project by 1st April 2026 are unknown, the feasibility and financial implications of introducing a new service by April 2026 are a challenge and represents a corporate risk. It is anticipated that the project will take a minimum of 18months from point of approval to initial service rollout.

### 3 Financial Implications

#### 3.1 Capital requirements

3.1.1 For the x9 new food waste collection rounds, x10 vehicles will need to be purchased: x1 for each round plus a spare vehicle. Caddies will also need to be purchased for both inside and outside of the properties. Estimated costings for these are shown below, which include a 10% contingency to allow for expected increases in vehicle and caddy costs due to the increase in demand.

Table 3

	Total cost	
Item	£000	Notes
7.5 tonne		
vehicles	1,265	x9 Vehicles for new rounds plus x1 spare required
		x1 per property (for inside) based on number of
Kitchen Caddy	142	properties in 26/27 (53,500 +10% spares)
		x1 per property (for outside), based on number of
Kerbside Caddy	277	properties in 26/27 (53,500 + 10% spares)
Total	1,684	

- 3.1.2 Capital budgets of £1.684m will be required to purchase vehicles and caddies, as included within the recommendations of this report for approval. £1.070m of funding has been received from Defra in capital grants, leaving a shortfall of £0.614m which will be funded via internal borrowing.
- 3.1.3. Based on internal borrowing for the £0.614m, over a 7-year period, this would result in in MRP and interest of approximately £0.689m in total. This is significantly less than it would cost to externally borrow via a PWLB loan.
- 3.1.4. Under the Council's Capital Strategy, the Section 151 Officer will, at the end of the financial year, review the funding of the capital programme to utilise funding in the most efficient and beneficial way for the Authority.

#### 3.2 Revenue requirements

#### 3.2.1 Weekly food collections

To deliver the weekly food collections, it is anticipated that x10 drivers, x10 loaders and x1 supervisor would need to be recruited on a permanent basis to cover the x9 rounds, including pool staff.

- 3.2.2 An expected annual revenue budget of around £1m is required to run the weekly food collection service. This revenue cost is not confirmed and options to reduce revenue costs are being explored.
- 3.2.3 There will be no disposal costs for the Council as this will be paid by Warwickshire County Council, however, Rugby Borough Council will also not receive any recycling credit income for food waste. At this time, it is expected there will be some funding towards revenue costs however Rugby has not received notification from Defra at this stage of how much this will be.

#### 4 Risk

- 4.1 There is a risk that if the Council does not progress the project in good time, then it will not be able to meet statutory duties within the specified timescale.
- 4.2 There remains a risk that government funding through new burdens may not cover the full additional net cost of these services.
- 4.3 There could be yet undefined financial penalties from Government for failure to commence the food waste collections service by the declared start date of 31 March 2026.

#### 5 Conclusion

- 5.1 This Council has a mandatory obligation under the Environment Act 2021 to provide a weekly food waste collection to residents. Defra have provided capital funding for the procurement of collection vehicles and food waste containers; however, this funding has been demonstrated to be insufficient to cover all costs and will require further monies from the Council.
- 5.2 It has been made clear that the supply chain for food waste vehicles and food containers (caddies) is experiencing unprecedented demand and delays are inevitable, with risk of increasing costs through such demand.
- 5.3 While it is unknown at this time what potential repercussions from not implementing this new service may be, it is possible that the government may impose fines upon Councils that are unable to demonstrate an acceptable level of progress towards doing so.
  - 5.4 It is therefore recommended that the capital funding is approved to ensure timely procurement of the necessary vehicles and caddies. Further reports on communication, collection-methodology, recruitment, revenue-costs, depot-restructuring and progress will follow in due course.

## **EQUALITY IMPACT ASSESSMENT (EqIA)**

#### Context

- The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
  - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
  - advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
- 2. The characteristics protected by the Equality Act are:
  - age
  - disability
  - gender reassignment
  - marriage/civil partnership
  - pregnancy/maternity
  - race
  - religion/belief
  - sex/gender
  - sexual orientation
- 3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
- 4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
- 5. The questions will enable you to record your findings.
- 6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
- 7. Once completed and signed off the EqIA will be published online.
- 8. An EqlA must accompany all **Key Decisions** and **Cabinet Reports**.
- 9. For further information, refer to the EqIA guidance for staff.
- 10. For advice and support, contact:

  Aftab Razzaq

  Chief Officer for Legal and Governance

  aftab.razzaq@rugby.gov.uk

  01788 533521



## **Equality Impact Assessment**

Service Area	Waste Services
Policy/Service being assessed	New Food Waste Collection Service
Is this a new or existing policy/service?	New service
If existing policy/service, please state date of last assessment	
EqIA Review Team – List of members	
Date of this assessment	14/11/2024
Signature of responsible officer (to be signed after the EqIA has been completed)	Claire Owen

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Chief Officer for Legal and Governance.



## **Details of Strategy/ Service/ Policy to be analysed**

Stage 1 – Scoping and Defining	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The introduction of a mandatory weekly food waste collection service to domestic residences within the borough. Domestic-premises food-waste collections were declared mandatory upon their inclusion in The Environment Act 2021. Introduced to help improve recycling across England and remove food waste disposal from landfill.  The new service is intended to promote and support the increase in recycling for councils and will contribute towards the council achieving its net-zero targets through improved recycling, better utilisation and recovery of resources and reduced unnecessary disposal costs.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<ul> <li>The service manager will work closely with the team and others to ensure the following priorities are met:</li> <li>Climate:</li> <li>reduce residents and businesses impact on the environment and help them adapt to the consequences of climate change.</li> <li>Organisation:</li> <li>Set robust, comprehensive and achievable budgets, exploring all avenues of income to meet our financial targets.</li> <li>Ensure that our organisational structure and methods of working are agile, efficient and effective.</li> <li>Treat taxpayers' money with respect and ensure that our high-quality services</li> </ul>
	<ul> <li>demonstrate value for money.</li> <li>Make best use of data and customer insight to design services and interventions</li> </ul>



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(2) What are the expected outcomes you are	The augeocaful decign, implementation and delivery of a new food wests collection
(3) What are the expected outcomes you are hoping to achieve?	The successful design, implementation and delivery of a new food-waste collection service will help reach climate targets, and foster equality, diversity, and inclusion within the workforce and the broader community.
	The new service will ensure compliance with statutory service provision while creating more local jobs.
<ul><li>(4) Does or will the policy or decision affect:</li><li>Customers</li></ul>	The decision will affect:
<ul><li>Employees</li><li>Wider community or groups</li></ul>	<b>Employees:</b> Rugby Council values diversity and promotes inclusive practices within the waste services team and the wider council staff. They ensure equal opportunities for all staff members, regardless of their background, fostering a respectful and supportive work environment.
	<b>Customers:</b> Waste Services Team understands the importance of engaging with a diverse community. They actively seek input and feedback from residents of different ethnicities, ages, genders, and backgrounds, ensuring that waste services meet the needs of all community members.
	Wider community: The Council are obligated to offer the new food-waste collection service to all its residents within the borough.
Stage 2 - Information Gathering	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).
(1) What does the information tell you about those groups identified?	



(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?	The introduction of this new service is a mandatory requirement under the Environment Act 2021 and is not influenced by views of the Public or the Council.		
(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	The introduction of a food waste collection service is a mandatory requirement and will not adversely affect individual communities directly; therefore, no consultation was not considered necessary.		
Stage 3 – Analysis of impact	No impact from this service		
(1) Protected Characteristics From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount	RACE	DISABILITY	GENDER
to discrimination?	MARRIAGE/CIVIL PARTNERSHIP	AGE	GENDER REASSIGNMENT
If yes, identify the groups and how they are affected.	RELIGION/BELIEF	PREGNANCY MATERNITY	SEXUAL ORIENTATION



(2) Cross cutting themes (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	No
(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?	No
(3) If there is an adverse impact, can this be justified?	N/A
(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (This should form part of your action plan under Stage 4.)	N/A
(5) How does the strategy/service/policy contribute to the promotion of equality? If not, what can be done?	As a Statutory service this collection service will be offered to all residents, who may choose to participate or decline involvement. In doing so will not affect their inclusion in any other element of waste collections within the borough.
	The Communications Plan will be aimed at promoting participation across all aspects of residents within Rugby, lines of support for those that may need assistance in order to participate. This will include specifics on Houses of Multiple Occupancies (HMO's), language-based challenges and cultural differences.
(6) How does the strategy/service/policy promote good relations between groups? If not, what can be done?	N/A



(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?

Access to the new service will as per other elements of waste collections within the borough, including residents with assistance-needs in presenting any waste containers for collection. This will be accessible through the councils existing 'assisted collections' service and subject to the same eligibility criteria.

# Stage 4 – Action Planning, Review and Monitoring

If No Further Action is required then go to – Review and Monitoring

(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.

### **EqIA** Action Plan

Action	Lead Officer	Date for completion	Resource requirements	Comments
Comms Plan	Andy Kelly / Matthew Deaves	1 <sup>st</sup> April 2025		The Comms plan will draw upon national and industry guidance to ensure all parts of the community are included

(2) Review and Monitoring
State how and when you will monitor policy
and Action Plan

The new service will be monitored and reviewed to consider any need to revisit communications and engagement, or service-level adjustments as necessary.



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Please annotate your policy with the following statement:

'An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).'



## **Rugby Borough Council**

## **Climate Change and Environmental Impact Assessment**

#### CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-2024) <u>link</u> sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Chief Executive.

If you require help, advice and support to complete the form, please contact Dan Green, Deputy Chief Executive.

Appendix 2

### **SECTION 1: OVERVIEW**

Portfolio and Service Area	Operations and Traded Services, Waste Services					
Policy/Service/Change being assessed	Food Waste Collection Service					
Is this a new or existing Policy/Service/Change?	New Service					
If existing policy/service please state date of last assessment	Existing Garden Waste & Food Waste collection service – last assessment date not known.					
Ward Specific Impacts	All					
Summary of assessment Briefly summarise the policy/service/change and potential impacts	Through the introduction of this new service there would be an increase in RBC operational staff, additional vehicles and an increase in energy usage at the Hunters Lane Depot site.  The increase in diesel vehicles will increase vehicle-based emissions across the borough.					
Completed By	Andy Kelly					
Authorised By	Claire Owen					
Date of Assessment	14/11/2024					

### **SECTION 2: IMPACT ASSESSMENT**

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage			$\boxtimes$	Increase in the numbers of operational staff using the depot facilities	Ensure council continues to use sustainable energy sources within the depot	Assets Dept.	Ongoing
Fleet usage				There would be an overall increase in the number of diesel-powered foodwaste collection vehicles on the roads within the borough	Specification and procurement of 'Euro-6' emissions-level vehicles.  A potential reduction in the number of diesel-powered waste collection vehicles subject to a reduction in the collection-frequency for residual black bins	Transport Manager	Ongoing
Sustainable Transport/Travel (customers and staff)			×	There will be an increase in the numbers of collections staff needing to get to the depot for work.	Actively promote sustainable travel options, cycle-to-work scheme and car-share to staff	Waste Services Manager	Ongoing
Sustainable procurement		×		Two procurement exercises would be required for new food- waste collection vehicles and new food caddies (containers)	Service to ensure future procurement is sustainable, where possible	Waste Services Manager	Dec-24 to Feb-25 tbc
Community leadership		$\boxtimes$		Working to improve recycling performances		Claire Owen	Ongoing

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				and reduce waste across the borough			
Biodiversity and habitats				Emissions can damage plants by clogging their leaves and affecting photosynthesis. Research has shown that highly urbanised areas near busy roads suffer from decreased biodiversity as nitrogen-tolerant plants replace more delicate species".	Fleet decarbonisation works and the use of biofuels	Claire Owen	Ongoing
Adaptation				Increase in vehicle emissions affecting local air quality levels	Consider the use of biofuels in vehicles, including any drawn directly or indirectly from the anaerobic digestion disposal facilities used.  Consider carbon offsetting through local tree-planting initiatives	Claire Owen	Ongoing
Impact on other providers/partners	×						

#### **SECTION 3: REVIEW**

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	13/11/2025
Key points to be considered through review	
Person responsible for review	Andy Kelly
Authorised by	Claire Owen