

# Joint Contract Work Programme 2022-23 Progress Update 08 March 2023

Report Author: Nick Meadows

#### Introduction

A report has been produced below (**Annex 1**) to keep members of the Joint Waste Collection Services Committee (JWCSC) updated on progress with the individual projects and activities under each objective of the joint contract work programme 2022-23. This report period covers mid-October 2022 to the end of February 2023. A summary of the key achievements from this report has been provided in the section below.

Principal officers of the Joint Waste Contract Partnering Board (JWCPB) received a briefing on a draft of this report on 9 February 2023.

More information on what each project and activity entails can be found in the joint contract programme of work 2022-23 document, which was approved at the JWCSC on 3 March 2022.

# Key achievements for this period

- A key project has been kicked off to simplify the reporting of issues and incidences with litter and dog waste bins managed by Amey.
- A new video has been produced to help provide additional training to Amey collection crew staff to spot and tackle contamination of recycling bins.
- Collections have been set up at several new developments in the joint contract area.
- New food waste collections were rolled out to about 2,700 flats in Surrey Heath.
- The Surrey Environment Partnership (SEP) 2025 approach document and annexes received sign off at the SEP Members Group meeting on 23 November 2022. All joint contract authorities have now individually adopted it via their governance processes.
- The SEP 'Own Your Impact' campaign focus from mid-November was on the festive period encouraging residents to buy more sustainably, reduce contamination of recycling bins over Christmas and recycle correctly after Christmas. The focus has now switched to encouraging residents to recycle their food waste and reduce the amount of food waste they produce. This campaign has been amplified in the joint contract area.
- Sign-ups to the Rethink Waste scheme in Elmbridge have now reached 3,003 residents, who are committing to reduce the amount of waste they produce. The evaluation of this pilot has been completed and a proposal for a countywide scheme has been included in the draft SEP work programme for 2023-24.
- Recycling guides for 2023 were delivered to all households in the joint contract area.
- Key processes have been established to ensure the contract continues to operate safely.
- A protocol document to protect those who work alone on behalf of Joint Waste Solutions (JWS) has been produced and published on the JWS intranet.

#### Recommendations

It is recommended that members note this update and the achievements during this period.

Annex 1: Joint contract work programme 2022-23 progress update mid-October 2022 to the end of February 2023

Objective 1: Improve the efficiency and effectiveness of the service enabling a better customer experience.		
Projects/activities	Progress update	
Customer enquiries and complaints	<ul> <li>Management of customer enquiries and complaints</li> <li>The JWS Operations East Team estimate that they dealt with an average of 200-250 complaints each week during this period in Elmbridge and Mole Valley¹. This is the same as the last period.</li> <li>In this period, Amey have recorded 432 complaints in Surrey Heath of which 19 were stage 2 complaints, and 822 complaints in Woking of which 45 were stage 2 complaints.</li> <li>The JWS Operations West Team estimate that they've directly received an average of 100-110 complaints a week during this period across their two areas. This is slightly higher than the previous report, largely due to complaints relating to garden waste billing.</li> <li>Since the last update a further 16 FOI requests have been responded to by the JWS Operations Teams.</li> <li>Complaints process review</li> <li>The first phase of the complaints process review is close to completion with final recommendations in the process and system changes required being documented. Once the report is finalised, in discussion with partners it will help decide which improvements are to be implemented in a phase 2 of the project from April 2023.</li> </ul>	
Contract management and performance monitoring	<ul> <li>Contract management and performance reporting</li> <li>Q3 litter and detritus surveys were completed in Elmbridge, Mole Valley and Surrey Heath in December. Results have been shared with Amey and performance deductions to be applied to the variable invoice for December in Elmbridge.</li> <li>Contract meetings have been held, including weekly depot/operational discussions, and the monthly Operations Board.</li> <li>KPI data is being reviewed monthly so that relevant deductions can be applied to the monthly variable invoices.</li> <li>Quarterly performance reports have been produced and statutory data returns (including Waste Data Flow reporting) have been completed on behalf of the four partner authorities.</li> </ul>	

<sup>&</sup>lt;sup>1</sup> In Elmbridge and Mole Valley customer enquiries are managed via their own authority customer relationship management systems (CRMs). Unfortunately, it's not straightforward to compare information from these systems, as different categorisations are used by the customer services teams. Customer enquires in Surrey Heath and Woking are managed by the Amey contact centre via Whitespace

## Contract monitoring processes

The contract manual continues to be drafted. The drafting of the guidance on remediation notices has been extended to cover all mechanisms to hold Amey to account. Progress has also been made on drafting guidance for planning application requests, non-domestic charging, annual sum invoicing and a health and safety overview. It's hoped these can be drafted by the end of March 2023. Work needs to be delegated to officers to write up individual processes, such as the LADS survey. Also, the complaint process review mentioned above shall look to produce guidance on complaint handling.

## Litter and dog poo bins

A comprehensive review of the litter and dog poo bins managed by Amey in Elmbridge, Mole Valley and Surrey Heath is underway. This includes reviewing bin distribution and bin condition to identify where changes may be required, scope costs and identify avenues for funding a programme of replacement/refurbishment. Alongside this, we are seeking to improve the reporting mechanisms, with the goal of simplifying the process for residents to report a problem with a bin, such as through the use of QR codes which link straight to the correct online form.

The latest update is that the bin sticker including a QR code has been designed for Surrey Heath and sent off to print, and we expect to start stickering their bins from early March 2023. CIL and levelling up funding to provide replacement bins in Elmbridge has been secured and we are looking to replicate this in the other areas with a business case currently being drafted for Surrey Heath. The first batch of replacement dual recycling bins has been ordered for Elmbridge.

# **Whitespace**

Whitespace is largely bedded in and is contributing to service improvement. Amey have introduced a performance dashboard to assist their management teams in targeting poor performing crews or repeat misses. The work by Elmbridge Borough Council (EBC) and Mole Valley District Council (MVDC) to integrate their systems is ongoing and will support improved performance and customer journey.

# Contract IT system improvements

The project working alongside Amey to look at how the data in Whitespace will be used to improve invoicing and key performance indicators (KPIs) has progressed in this period. Irregularities in the invoicing process and how this can be addressed have been discussed, and work continues to move this forward. The project is also now focusing on how data supporting the KPIs can be extracted out of Whitespace.

## **CRMs**

Weekly meetings have been taking place between JWS, EBC, a software company called IEG4 and Whitespace to progress the integration of webforms being developed by IEG4. Separate meetings have been held between

	EBC and JWS to review processes for the forms which will be built in-house and this work is ongoing. MVDC are in the process of integrating their missed bin form.
Future service delivery resulting from upcoming changes in national policy	While we await more details from Government on the collection and packaging reforms, especially on consistency in recycling collections, we did receive a bit more information at the end of 2022 on Extended Producer Responsibility (EPR) in terms of payments and what data will be required to inform assessments. A summary of what has been learned from recent webinars and workshops was shared with the principal officers and portfolio holders in the SEP update sent on 16 December 2022. We continue to engage Defra on this topic and will share further details with the joint contract area when it becomes available.  The Government also released its response to the deposit return scheme consultation on 20 January 2023. The
	key points we have learned so far from this was shared with principal officers and portfolio holders on 27 January 2023.
	A series of reviews have been agreed with Amey, which shall improve the information of communal bins and number of subscribed garden waste bins.
Data management	In addition the review of assisted collections has begun in Elmbridge and Surrey Heath and will shortly be started in Mole Valley and Woking. Residents who have been using the service for two or more years are being contacted to confirm if they still need help with their bins.

Projects/activities	Progress update
Amey staff training video on reducing contamination of DMR	JWS have finished the production of a newly created Amey staff induction training video. It will help collection crew staff to spot and tackle contamination of recycling bins. The video will be used to train new staff and to provide refresher training for existing staff.
Collections policy and managing agent guidance	Work is underway to document and publish a general collections policy which applies to all property types and a set of guidelines for managing agents and landlords on their roles and responsibilities in supporting their residents to appropriately dispose of their household waste. Both documents will be useful for managing waste inquiries consistently and for collaborating with managing agents to address problems that are affecting services for residents. The aim is for the guidance to be ready by the end of May 2023.
Set up of collection services at new developments	The JWS Operations Teams have provided comments on requirements for waste storage and collections as part of submitted planning applications on new developments, to ensure they are fit for purpose. As part of the planning process, site visits are often undertaken to confirm requirements or answer developers' queries. The team estimate that they are reviewing about 50-55 planning applications a month, across all four areas. This is down by about 10 applications a month compared to the last period.

The team are then liaising with developers/agents to commence collections as new developments are occupied. In recent months, some significant developments have become occupied across the joint contract area. The JWS Operations Teams have supported developers in specifying bin requirements, and overseeing the delivery of containers and start of collections at sites including:

- Ambers Court, Walton-on-Thames in Elmbridge.
- Tanners Meadows, Brockham in Mole Valley.
- Further phased occupation of Woodside Grove, Bagshot in Surrey Heath.
- Further phased occupation of the flagship development, 'The Marches' in Woking town centre.

The joint contract area is benefitting from the delivery of the following key countywide service improvement initiatives:

#### Improving food waste recycling for flatted properties with collection services

The results of the previous trial that took place in several areas across Surrey including Woking to increase the use of food waste recycling services has been analysed initially. These trials used a letter or leaflet to promote the benefits of using the food waste service, with bin labels and signage also updated. The initial results are inconclusive and show that there aren't concrete themes over the trial areas. The project is also likely to have been impacted by the cost-of-living crisis. This could have reduced food waste which may have impacted the tonnage assessment of what was captured.

Benefit from countywide service improvement initiatives.

# Introducing food waste collection services at flatted properties where there is currently no collection

- The Surrey Heath rollout to 2,700 flats was completed in mid-November. Post monitoring of this rollout is underway with tonnages being analysed to truly understand the full impact of the work. This initial analysis is set to be complete by the end of March 2023.
- A rollout plan to about 2,000 flats in Elmbridge is currently being developed, with preliminary site visits already occurring earlier in the year. The plan is set to be agreed in March 2023 with rollouts to occur in Q1 of 2023-24.
- A rollout plan for about 2,000 flats in Mole Valley is currently paused due to resource constraints within the team but will be picked up again in March 2023. It's expected that this rollout will occur at the start of Q2 23-24.
- Discussions will continue with Woking and the JWS Operations Teams to establish a plan for future rollouts to remaining flats.

Contamination reduction at flats

Further interventions are required at the Heart site and other properties in Elmbridge following recent issues that have been identified. Some work has taken place at the Heart site, but the rest of this and work to other properties in Elmbridge will be completed during Q1 23-24.

## Contamination reduction targeted interventions

A total of 194 letters went out to households in the joint contract area during August to October where contamination of their recycling bin had been identified. These bins were rejected and tagged with a hanger to state that contamination had been found. These households were then compared with a 'control group' of 205 households in the joint contract area, where contamination had also been identified in their recycling bin. The bins from these households were also rejected, however only a hanger was applied, and a letter was not sent. The contamination behaviour of both sets of households was reviewed to understand the impact the letters and bin hangers have had. The analysis indicates that the letters have not had an additional impact on contamination behaviour compared to rejecting a bin and applying a hanger. A report including recommendations from the project is being written up and is due to be shared with SEP officers by March 2023.

## Shared contamination monitoring resource team

The inspection of communal bin stores and kerbside recycling bins to see what improvements can be made to reduce contamination and improve the quality of recycling has been completed. Data analysis has been conducted with the initial raw data shared with the participating D&Bs alongside individual recommendations to address contamination.

# SEP 2025: A partnership approach to waste prevention and recycling

The SEP 2025 approach document and supporting annexes were approved at the SEP Members Group on 23 November 2022. A process has now started to get SEP 2025 adopted by individual Surrey authorities via their respective governance processes. All joint contract authorities have now individually adopted SEP 2025 via their decision making bodies.

In tandem with this, we have started work to develop individual delivery plans for SEP's authorities which support the priorities in SEP 2025. We have now met with all of Surrey's authorities to discuss outline plans and hope to refine and agree them by early March 2023, before they are reviewed by the SEP Funding Board on 16 March 2023 to ensure they are fair and consistent ahead of delivery commencing from 1 April 2023.

# Doman Road redevelopment

It has been agreed with Surrey Heath Borough Council (SHBC) that the redevelopment of Doman Rd will be paused until Surrey County Council (SCC) are able to prepare their business case, as to ensure that both

organisations have agreed costs before taking papers for decisions. It is likely that SCC will be developing their business case in May / June 2023.
Randalls Road depot development We are still finalising the different aspects of this work including how this will be resourced, however in the meantime MVDC have approved the kick off of this project.
Waste data system A new contract has been agreed with OpenSky, which includes additional provisions to manage the performance and maintenance of the system. This will be for 2 years from March 2023, with 2 additional 1-year extensions. Additional mechanisms have been agreed as part of the contract to ensure OpenSky meet their KPIs.

Objective 3: Ensure residents are informed about their collection service		
Projects/activities	Progress update	
	Service delivery communications during this period continued to respond to the seasons including leaf clearing, wet weather messages about keeping cardboard dry, and messages about frozen bins. Communications also covered the festive period collection pattern changes, advice about how to dispose of Christmas trees, battery fires and careful driving around crews.	
Service delivery		
communications	In addition, new garden waste tags were produced for Elmbridge, recycling and rubbish signs were produced for Surrey Heath and Woking and new events banners were produced. The joint contract introduction film for members was also updated and litter bin stickers have been produced. Communications have also been produced to support the assisted collections review mentioned earlier.	
	The JWS website was updated regularly to communicate service-related information including any issues with daily completions. The garden waste section was also updated when Mole Valley confirmed they were able to take new garden waste subscribers and a new page was created to support the assisted collection review.	
Digital channel management	From 1 April 2022 to 19 February 2023 there were 557,760 page views of the JWS website. The most visited page continues to be where residents can check their collection day, followed by the pages related to garden waste and where to report a missed collection.	
	In addition to the above we have also started the refresh of the JWS website and completed phase one. This involved:	

	<ul> <li>Merging Request and Report into one section so all can be found in customer request pages one place.</li> <li>Adding an 'Other enquiries' page for additional reports that residents can make that don't require a dedicated page, such as reporting bins that have not been put back properly after collection and reporting spillages caused by collection crews. Area specific links on how to report these things were also added.</li> <li>Updating the street cleaning page to include information of what we do and where.</li> </ul>
	The JWS Twitter account management involves responding to customer queries and complaints. Wherever possible this is done by diverting the resident away from the public Twitter feed and into direct messaging. From 1 April 2022 to 19 February 2023, we received 293 customer queries via Twitter and responses were managed in conjunction with the JWS Operations Teams.
Media management	Two media enquiries from the Sunday Times were managed during this period. The first related to Surrey Heath's high recycling rate, asking why we thought it was high and also querying end destinations for the recycling. The second came from the newspaper's agony aunt who was contacted by a Woking couple who were having difficult dealing with Amey about their garden waste subscription. Responses were provided for both and the latter was flagged with Amey to try and avoid similar issues in the future.
Provide content for partner channels	Content related to the topics listed above was created for the joint contract partner communications teams to share via each council's own channels. Content was also drafted for the March issue of Surrey Heath's resident magazine Heathscene and their fortnightly member briefings.

Projects/activities	Progress update
	The SEP Own Your Impact campaign continued its focus on food waste recycling until early November and this was amplified with additional activity in the joint contract area. This has now been evaluated and results include 19,000 video views, 178,000 views of Facebook posts and over 6,000 website visits.
Own Your Impact campaign amplification	Following this, the Own Your Impact campaign focused on festive messaging, aiming to reduce contamination of recycling bins, as well as encouraging residents to make sustainable choices when shopping and providing advice about food waste reduction. This was also amplified in the joint contract area with activity targeted by postcode. The results included more than 42,000 video views, 11,000 website visits and 471,000 Facebook impressions resulting in 6,300 engagements (shares, likes, comments etc). There were also almost 18,000 searches on the Surrey Recycles online tool and app countywide during the campaign period.

	Other communications during this period focused on Christmas-related awareness days, such as Black Friday, Cyber Monday and Christmas Jumper Day and more recently National Pie Day, Valentine's Day and Pancake Day.
	A contamination campaign ran in the joint contract area during September and October using template artwork from WRAP's new Let's Recycle Right toolkit, adapted to reflect the kerbside recycling collections in the joint contract area.
Contamination communications	The evaluation showed there were 21,123 views of the campaign pages on the JWS website and the campaign video was seen 13,346 times across Facebook, Twitter and YouTube. There were also 1,368 engagements (likes, comments, shares, link clicks) on SEP Facebook posts targeted to joint contract area postcodes; 15,616 searches on the Surrey Recycles search tool; 333 app downloads; and almost 800 plays of the waste sorting game, even though this wasn't specifically promoted. As a result, the remaining budget for contamination communications will be used on a second phase of the campaign in March.
	Promoted (paid) posts on social media are used to amplify the SEP campaigns through the SEP Facebook page, targeted to postcodes in the joint contract area and through JWS Twitter.
Social media	Organic (non-paid) posts which communicate key messages about recycling and reducing waste are also regularly shared on JWS Twitter, alongside service-related messages. The total reach for this from 1 April 2022 to 19 February 2023 was 131,396 and there were 5038 engagements which are retweets, likes and comments. The biggest spikes were for festive messaging including Christmas tree disposal, weather-related comms about frozen bins and wet cardboard and food waste recycling.
Community events	The JWS Operations West Team hosted a recycling workshop to a School in Woking to help them on their way to achieving their 'Eco-School' accreditation. The Operations East team have attended two to Women's Institute meetings in Mole Valley in recent weeks. We will continue to support these types of events where requests are made. Materials for use at events are also in development.
Gain maximum benefit from countywide engagement initiatives	Rethink Waste Work has continued in this period to promote the waste reduction engagement and incentive scheme Rethink Waste to residents and schools in the trial area of Elmbridge. The second phase of the local school's initiative closed at the end of October. Five local primary schools took part and encouraged parents of their pupils to sign up and donate points to them that they earned by completing waste reduction activities. The winning school, Esher Church School, won £419 that they plan to use to develop the school's recycling and waste reduction facilities.
	In November, the scheme looked at the impact of electrical waste on the planet, what it is and how to safely dispose of it. Pointing out locations to recycle, including batteries. An email was sent on 14 November to

subscribers of the Elmbridge garden waste collection service for a chance to win a host of great prizes including a £50 garden centre voucher if they signed up to the scheme. In December, the scheme focused on having a zero waste Christmas, by removing as much waste as possible. This campaign looked at making our own festive treats, zero waste gifts to buy family and even decorating the home. It also signposted where people could safely send their waste, should they create any. A second email was also sent to subscribers of the Elmbridge garden waste collection service encouraging them to sign up to the scheme. Throughout January, the scheme introduced easy tips and tricks to hopefully pass on new sustainable habits to residents.

As of 10 February 2023, 3,003 Elmbridge residents had signed up to the scheme (an increase of 1,263 since 30 September 2022) who are committing to reduce the amount of waste they produce. Most of this increase can be attributed to the emails that were sent out to subscribers of the garden waste collection service.

The evaluation of the Rethink Waste scheme from November 2021 to October 2022 has now been completed. The key highlights from this are:

- 3% of households signed up in Elmbridge (not including the garden waste subscriber email).
- Households on collection rounds that had high numbers of sign-ups reduced their rubbish tonnages by 3.4% more than those on rounds with lower numbers of sign-ups. If all rounds had a similar level of high sign-up, then the trial could have achieved a 3%+ reduction.
- Households that signed up engaged very well with the content with over 27,000 engagements.
- Residents in the scheme were surveyed in March and October 2022 and results indicated positive behaviour change.
- It was difficult to compare tonnages because of COVID-19, but a summary of tonnages showed:
  - Compared with the same period during the previous year, rubbish tonnages in Elmbridge reduced by 5.1% whereas in Mole Valley, an area that has had historically similar tonnage trends, tonnages reduced by 2.5%.
  - Compared with pre-COVID, rubbish tonnages collected during the measurement period of 1 May 31 October 2022, remained roughly similar.
  - Compared to the same period in 2021, rubbish tonnages in Elmbridge reduced by 0.6% more than the average of the other ten district and borough councils (D&Bs) in Surrey.
- It's likely that many residents in the scheme have become champions of waste reduction in their communities.
- 16 primary schools in Elmbridge engaged in waste reduction with each of them receiving funding to carry out a project that will benefit their environment.
- 3,675 cash donations were made to charities by Elmbridge households. Greenredeem have been asked for further information on this.

The learning from this scheme is being used to inform the planning for a countywide scheme to be delivered in the SEP 2023-24 work programme.

## Recycling guides

Recycling guides and calendars for 2023 were delivered to all households in the joint contract area by mid-November 2022.

## Food waste targeted interventions

Post-intervention monitoring for the targeted communications that went out during October 2022 to houses in Elmbridge and Mole Valley identified using in-cab data as ones not regularly using the food waste collection service has been underway since November 2022.

Work was also carried out to further extend the communications in Mole Valley in February and a total of 17,734 properties were targeted. Evaluation to assess any increase in participation and tonnage will now be undertaken.

Objective 5: Manage the i	oint waste contract to ensure it is resilient.	operating safely, and performing effectively.
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Projects/activities Progress update	
Operational Health and Safety monitoring	<ul> <li>A variety of work has been undertaken to ensure the joint contract operates safely including:</li> <li>Depot audit reports are completed for all four sites, and a tracker for resulting improvements and actions created. Regular update meetings are held with Amey and JWS to review progress on the outstanding items.</li> <li>A weekly report for outstanding close calls has been implemented notifying JWS of any responses that are overdue or close to deadline, to ensure updates are provided to Amey in a timely way.</li> <li>A review of the route round risk assessments is underway and are due to be completed by end of March 2023.</li> <li>JWS have attended SHBC'S quarterly health and safety committee meeting providing updates and stats.</li> </ul>

Business Contin	uity	Action to review our response to the industrial action is ongoing. The lessons learnt report has been shared with the JWCPB, JWCSC and Amey for feedback. An action plan is now being produced and built in to the 2023-24 programme of work.	
·		Amey submitted their revised business continuity plan, and it has been agreed a risk workshop shall be held in the final quarter to strengthen the range of scenarios covered and test their plan.	

Objective 6: Support the joint contract authorities' carbon reduction plans	
Projects/activities	Progress update
Reporting emissions from waste collection activities	Emissions data for 2021-22 is being collected, this has been provided by Amey for the operational elements of the joint contract area. Data is being collated, checked and results will be published in the Recycling in Surrey 2021-22 report (expected early-mid 2023 dependant on when Defra publish the data), and to each joint contract authority individually.
Working towards a net- zero emissions vehicle	SEP Infrastructure & Transport Delivery Plan Initial project work has continued on developing an infrastructure & transport delivery plan for Surrey. Initial stages of the project delivery include setting up a SEP working group by early March 2023, and scoping procurement to appoint external consultancy support to baseline our current services and model future options. The aim is to have the external consultancy appointed by early April 2023.
fleet	Amey low carbon fleet replacement As part of the original schedule 27, several street cleaning assets including sweepers and cages are due for renewal. Prior to bringing forward the details of vehicles Amey wish to purchase; they are reviewing options for low carbon fleet replacements. However, this work has been delayed and JWS are hoping to receive Amey's proposal shortly.

<b>Objective 7:</b> Work with partner authorities to ensure the work programme is delivered with appropriate governance and oversight.		
Projects/activities	Progress update	
Joint contract governance	<ul> <li>JWS attended the meetings of SHBC's P&amp;F Committee meeting in November 2022 and January 2023, as well as the Woking O&amp;S Committee meeting in January 2023.</li> <li>JWCPB and JWCSC meetings were held in November/February and December respectively, with briefings for partner authority officers and members also provided beforehand.</li> <li>Regular meetings have been held with board members to update on discussions with Amey regarding service improvements and efficiencies across the contract.</li> </ul>	

Networking	We have continued to gain insight and intelligence from authorities and the wider industry by contributing to SEP working groups and sharing/obtaining best practice.
Financial management	Quarterly budget update reports are produced in conjunction with SHBC's Finance Team to present to the JWCPB and JWCSC meetings. Budgets for 2023-24 were presented and approved at the November cycle of JWCPB and JWCSC meetings.

Objective 8: Enhance our ways of working to deliver organisational efficiencies.		
Projects/activities P	Progress update	
Review ways of working  L T ir	Savings opportunities  Work is underway to provide a background document for kerbside WEEE & textiles collections and review the costs and income linked to bring sites in the joint contract area. The team are also exploring opportunities to obtain external funding for projects that can be delivered in 2023-24.  Future office working  Various options for new office locations have been considered by JWS's Senior Leadership Team. The unfeasible options have been eliminated and the preferred option for alternative office space and storage within Dukes Court is being discussed with the marketing agent.  Lone worker review and protocol document  The lone worker protocol document was finalised and signed off in November. It has been published on the JWS intranet and will help ensure a consistent approach is followed to protect those who work alone on behalf of the organisation.	