

RBKC Guidance Policy: Storage and Presentation of Household Rubbish and Recycling

1. Purpose

This policy sets out:

- how household rubbish and dry mixed recycling must be stored between collections;
- how waste must be presented for collection;
- the standards applying to communal waste storage areas;
- the circumstances in which waste should be presented on the public highway;
- when collection crews may suspend entry to a storage area;
- how alternative collection arrangements will be agreed and communicated; and
- the respective responsibilities of residents, managing agents, property managers, the Council and its collection contractor.

The policy is intended to support safe, consistent and reliable collections while minimising obstruction, litter, staining, vermin, odour and avoidable impacts on the public highway.

2. Scope

This policy applies to:

- individual houses and flats;
- houses in multiple occupation;
- mansion blocks and purpose-built blocks;
- properties with basement, internal, external or communal waste storage;
- properties normally collected from within their boundary;
- properties required or permitted to present waste at street level; and
- temporary alternative collection arrangements introduced because a normal collection point is inaccessible or unsafe.

It covers routine household rubbish and household dry mixed recycling. It does not replace the separate arrangements for food waste, bulky waste, clinical waste, hazardous waste, garden waste, commercial waste or construction waste.

3. Core policy principles

3.1 Safe collection

No resident, property manager, Council officer or contractor will be expected to require a collection operative to enter an area that the operative or supervisor reasonably considers unsafe at the time of collection.

Each attendance may be assessed according to the conditions found at that time. A collection completed on a previous occasion does not guarantee that collection will be possible if access, presentation or site conditions have changed.

3.2 Proper containment

Household rubbish must be contained in securely tied, sufficiently strong bags designed for containing waste (this excludes carrier bags or paper bags) or in an appropriate waste receptacle. Recycling must be separated and presented in accordance with the Council's recycling instructions.

Waste must not be left loose on the floor of a storage area or on the public highway. Torn, leaking, excessively heavy or insecurely closed bags may be unsafe to handle and may not be collected until corrected.

3.3 Clear and accessible presentation

Waste must be placed at the property's normal or formally agreed collection point. Collection operatives must be able to reach it safely without moving unrelated objects, climbing over waste or passing through an identified hazard.

3.4 Minimum impact on the highway

Where presentation on the public highway is required or agreed, it must take place only in accordance with the property's scheduled collection arrangements. Waste must be positioned so that it does not obstruct pedestrians, wheelchair users, people with pushchairs, access to buildings, emergency routes, crossings, carriageways or other highway users. Any bags placed out on the public highway should be left directly in front of the premises from where it has originated, unless written confirmation from the Council provides permission for an alternative location to present the bags.

3.5 Clear communication and evidence

Where a collection is not completed because of a site condition, the Council and contractor should provide a clear explanation identifying:

- the condition encountered;
- whether the restriction is temporary or ongoing;
- whether the whole collection or only part of it was affected;

- the corrective action required;
 - the interim presentation arrangement, if any; and
 - how the normal arrangement may be restored.
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4. Waste storage between collections

4.1 General requirement

Household waste should normally remain within the boundary of the property between scheduled collections.

Where a property has a designated waste storage area, residents should use that area unless:

- the Council or contractor has advised that it is temporarily unsafe;
- access has been suspended;
- an alternative collection point has been formally agreed; or
- the property owner or manager has lawfully withdrawn the facility and suitable alternative arrangements have been made.

The Council's published guidance currently states that rubbish should be left in the waste storage area where the property has one, or on the pavement near the kerb without causing an obstruction. It also requires waste to be presented by 7am on the collection day and not the night before.

4.2 Purpose of a communal storage area

A communal storage area allows residents to remove waste from individual homes and store it securely between collections. It can therefore provide continuous access for residents, subject to the building's own management arrangements.

Closing a communal store may transfer responsibility for retaining waste between collections to individual households. Before a permanent street level arrangement is introduced, the building manager should consider the effect on all affected households, including people with limited mobility and residents who may be unable to present waste at the required time.

4.3 Use of the storage area

A communal waste storage area must be used only for the waste streams and receptacles intended for that area.

Residents must not place in the storage area:

- furniture or bulky household items;
- building or refurbishment waste;

- electrical appliances;
- liquids, oils, paints or hazardous materials;
- hot ashes;
- loose food or loose household waste;
- items that obstruct access to the bins or bags;
- parcels, deliveries or other property not intended for disposal; or
- any item that cannot be collected through the routine household service.

The Council's published information warns that storage areas should be used only for rubbish and recycling, and that collection crews cannot inspect every item to determine whether it has been left for disposal. The Council and their contractor will not accept liability for any items removed from a storage area, that were not intended for disposal.

5. Standards for communal waste storage areas

The owner, landlord, freeholder, managing agent or other party responsible for the communal area should ensure that it is maintained so that collections can be completed safely.

5.1 Access

The route to and from the storage area should:

- be clear and unobstructed;
- provide sufficient space for operatives to move and handle bags or receptacles safely;
- have secure and even walking surfaces;
- be free from trip, slip and fall hazards;
- have gates, doors and locks that operate correctly;
- be accessible using any key, code or access arrangement agreed with the Council;
- be free from unprotected building works, scaffolding or stored materials; and
- provide a safe means of entry and exit.

Where access involves steps or a basement staircase, the staircase should be in good condition, have suitable grip and have a sturdy handrail.

5.2 Lighting

Where an operative is required to enter an enclosed or basement storage area, lighting must be sufficient to allow the operative to see:

- the access route;
- steps and changes in level;
- the floor surface;
- the bags or receptacles;

- obstructions and loose material; and
- the route out of the area.

5.3 Cleanliness and containment

The storage area should:

- be kept reasonably clean;
- be free from loose and scattered waste;
- contain no torn or leaking bags;
- have sufficient receptacle or storage capacity. The correct storage receptacles for placing bags are outlined in **Appendix 1** of this policy on page 13;
- allow receptacles to be accessed without climbing over bags;
- be free from excessive accumulations of cardboard;
- be managed to prevent offensive odour and liquid leakage; and
- be cleaned promptly where a bag has split or leaked.

5.4 Vermin and other hazards

Evidence of active vermin, serious infestation, sharps, hazardous substances, unstable material or another immediate safety risk may result in collection from the storage area being suspended.

The person responsible for the property may be required to:

- arrange appropriate treatment or removal;
- clean and secure the area;
- provide evidence that the hazard has been addressed where reasonably requested; and
- maintain an agreed temporary presentation arrangement until normal collection can resume.

6. Correct presentation within a communal storage area

Residents must:

- place rubbish in securely tied bags and then into a designated rubbish receptacle;
- place recycling in the designated recycling bag and then into a designated receptacle;
- it should be noted that the use of recycling bags is not required for containers/Euro bins. We don't provide residents with clear recycling bags for recycling at many of these types of properties (estates / mansion blocks / blocks of flats)
- separate rubbish and recycling correctly;
- ensure that dry mixed recycling is not contaminated with non-recyclable materials
- flatten cardboard where required and place it in the designated location;

- keep bags within the receptacle or agreed collection area;
- avoid overfilling receptacles;
- replace or re-bag any torn or leaking bag;
- keep access routes, doors and steps clear; and
- use the correct service for bulky or non-routine items.

The Council collects reasonable quantities of routine domestic waste but does not collect items such as furniture, white goods, paint, oil, carpets, wood or builders' waste through the ordinary household collection.

Appendix 2 on page 14, provides examples of a well presented communal storage area and one that is badly presented.

7. Presentation on the public highway

7.1 When highway presentation applies

Waste may be presented at street level where:

- the property has no designated storage area from which the Council collects;
- street presentation is the normal arrangement for the property;
- the Council and contractor have agreed a permanent street collection;
- a temporary restriction prevents safe collection from the normal storage area; or
- a site-specific arrangement has been agreed for accessibility or operational reasons.

Residents and property managers must not independently move the collection point from private land to the public highway without agreement from the Council.

7.2 Time of presentation

Unless a different arrangement has been expressly confirmed:

- rubbish and recycling must be presented by **7am on the scheduled collection day**;
- it must not be placed outside the night before;
- it must not be placed outside on a non-collection day; and
- residents should check the Council's collection information for any exceptional holiday arrangements.

7.3 Location of presentation

Waste must be placed:

- at the property frontage or other point agreed with the Council;
- as near the kerb as reasonably possible;
- in a position clearly identifiable as belonging to the property;

- clear of entrances, steps, cellar flaps and emergency exits;
- without blocking the pedestrian route;
- without being placed in the carriageway or impeding access to parked vehicles;
- without obstructing access to neighbouring properties; and
- so far as practicable, away from street furniture and locations where bags are likely to be torn or displaced.

7.4 Condition of bags and recycling

Waste presented on the highway must:

- be securely contained;
- be of a weight that can be handled safely;
- not leak liquids;
- not contain exposed sharp objects;
- not contain hot, hazardous or prohibited materials;
- have glass securely wrapped where placed in residual waste;
- have cardboard flattened and secured; and
- comply with the Council's separate recycling guidance.

7.5 After collection

Property managers and residents remain responsible for:

- returning reusable receptacles to the property;
- removing waste that was not collected because it was presented incorrectly or contained prohibited material;
- dealing promptly with any bag that splits before collection; and
- reporting a genuine missed collection through the Council's reporting process.

The Council's published guidance provides that a collection may be reported as missed if it has not taken place by 3pm, with arrangements then made for collection within 24 hours.

Appendix 3 on page 15, provides examples of well presented and badly presented rubbish and recycling on the street.

8. Multi occupancy properties moving to street level collection

A permanent change from a communal store to street presentation affects the whole building and should not be implemented solely in response to the preference of one resident.

Before implementing the change, the managing agent or responsible property body should:

1. consult or otherwise notify every affected household;
2. explain the loss of communal storage between collections;

3. state the relevant collection days and 7am deadline;
 4. explain that waste must normally be retained within individual homes at other times;
 5. consider reasonable arrangements for residents with mobility or accessibility needs;
 6. identify the agreed highway presentation point;
 7. assess whether simultaneous presentation will obstruct the frontage;
 8. nominate a single contact for the Council;
 9. provide written confirmation that residents have been informed; and
 10. agree an implementation date with the Council and contractor.
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9. Unsafe or non-compliant presentation

9.1 Crew decision

A crew may stop, suspend or limit a collection where it encounters:

- unsafe or restricted access;
- inadequate lighting;
- damaged or uneven floors or steps;
- a defective handrail;
- loose, torn or leaking waste;
- obstructing furniture or bulky material;
- evidence of vermin;
- unprotected works or unstable materials;
- scaffolding;
- excessive weight or an unsafe manual-handling task;
- hazardous or sharp material; or
- any other condition that reasonably presents a risk.

9.2 Partial collection

A partial collection may be made where safely accessible and correctly presented waste can be removed without the crew entering or passing through the hazard.

A partial collection is not guaranteed. Correctly tied bags do not have to be collected if reaching them would expose the crew to the identified risk. The decision should reflect the actual circumstances at the attendance.

9.3 Recording an unsuccessful collection

The contractor should record, proportionately:

- the property;
- date and collection round;
- reason the collection was not completed;
- location and nature of the hazard;

- whether a partial collection was considered or made;
- any photograph, video, hazard notification or risk record;
- the temporary collection instruction; and
- the action required before normal collection resumes.

Where photographs or video are relied upon, the date, approximate time, person or team recording the material and its relationship to the collection attendance should be retained where the system allows.

10. Notification and corrective action

Where practicable, the Council or contractor should notify the responsible resident, managing agent or property contact of:

- why the collection could not be completed;
- what must be corrected;
- where waste should be presented in the interim;
- whether the restriction applies to entry, particular material or the whole collection;
- whether the arrangement is temporary;
- how a review or site visit can be requested; and
- who is responsible for communicating the information to residents.

Instructions should distinguish clearly between:

- a permanent Council collection requirement;
- a building specific instruction;
- a temporary restriction following a hazard report; and
- a one off operational decision made during a particular attendance.

11. Restoring collection from a storage area

Normal collection from a storage area may resume when:

- identified hazards have been removed;
- access and lighting are suitable;
- loose or prohibited waste has been cleared;
- pest activity has been addressed where relevant;
- necessary repairs have been completed;
- collection instructions have been updated; and
- the Council or contractor is reasonably satisfied that collection can be undertaken safely.

A site visit may be arranged where the position cannot be established from the information provided.

12. Roles and responsibilities

Residents

Residents are responsible for correctly separating, containing and presenting their own waste and for following the arrangements communicated for their property.

Landlords, freeholders, managing agents and resident management bodies

The person or organisation responsible for the communal area is responsible for:

- maintaining the store and access route;
- providing sufficient storage arrangements;
- keeping the area clear and reasonably clean;
- arranging repairs, lighting and pest treatment;
- communicating collection instructions to all households;
- managing any change to the building's storage arrangements; and
- providing a nominated contact.

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The Council is responsible for:

- determining the overall collection service;
- maintaining clear public guidance;
- agreeing property specific collection points;
- investigating reported service failures;
- monitoring contractor delivery;
- ensuring residents and property managers receive a clear explanation of restrictions; and
- considering accessibility or exceptional circumstances where raised.

Collection contractor

The contractor is responsible for:

- delivering the collection service on the Council's behalf;
- undertaking immediate operational safety assessments;
- recording collection exceptions and hazards;
- informing the Council of restrictions;
- following the agreed collection instruction; and
- providing sufficient evidence and explanation to support decisions not to collect.

13. Accessibility and individual assistance

A building wide change should consider whether residents are elderly, disabled, have limited mobility or would otherwise experience substantial difficulty using the agreed presentation point.

Residents requiring assistance should contact the Council so that their circumstances can be considered separately. An individual assistance arrangement should not be assumed to change the requirements applying to every other household in a multi occupancy property.

14. Waste placed out incorrectly

Waste placed on the public highway:

- on the wrong day;
- too early;
- at an unapproved location;
- in a way that obstructs passage;
- in leaking or insecure bags; or
- after being refused because it contains prohibited material

may be investigated in accordance with the Council's applicable waste and street enforcement arrangements.

Incorrectly presented bags may be investigated, re-bagged and left for the next collection, while immediate removal may be prioritised where the waste obstructs safe use of the footway. Where evidence is obtained, the Council may pursue enforcement action which can lead to the serving of fixed penalty notices and/or prosecution.

15. Complaints, missed collections and disputes

A resident should report:

- an uncollected correctly presented bag or receptacle as a missed collection;
- repeated problems with a communal store to the property manager and the Council;
- an obstruction or significant street waste problem through the appropriate Council reporting route; and
- dissatisfaction with the Council's response through the corporate complaints' procedure.

A complaint response should address both:

1. whether the operational decision was reasonable; and
2. whether the Council explained the decision clearly, consistently and with appropriate supporting records.

Requests for recorded information must be handled separately under the applicable information access legislation and must not be treated as a substitute for investigating the service complaint.

Appendix 1 – Bin types for storage areas

Dustbins. The following design is the type of bin that must be used for storing bags. These are the kind of bins suitable for use in kerbside property storage areas. Do not use wheelie bins, as their design presents health and safety risks for operatives reaching down to pull bags out. This can result in muscular skeletal injuries.



Euro bins. These are generally used in large storage areas on estates, mansion blocks and other big developments.



Appendix 2 – Examples of communal storage areas

Well presented. The following picture is an example of a well presented communal storage area. The rubbish and recycling is contained within the bins and the lids are securely closed. There isn't any side waste left on the floor around the bins.



Badly presented. The following is an example of a badly presented communal storage area. Bags and boxes are all over the floor presenting a trip hazard and potential to attract vermin. Nothing is contained and secured within bins.



Appendix 3 – Rubbish and recycling bags presentation on the street

Well presented kerbside rubbish and recycling. Bags are placed in separate rubbish and recycling piles close to the kerb. The bags are not an obstruction to parked vehicles nor pedestrians using the pavement.



Badly presented kerbside rubbish and recycling. Bags and cardboard placed with no consideration for pedestrians. Stacked high and at risk of spilling into the carriageway. Could pose particular problems for people with disabilities, poor eye sight and those with pushchairs.

