**Background**

This EIA looks at the services provided under the East Sussex Joint Waste Partnership and considers if the policies in place support and promote fairness to all customers. This EIA examines whether policies require ammendment if they are deemed to prohibit equality and or promote discriminate against others. As well as identifying areas of inprovement this EIA identifies opportunities to improve access, promote equality and further develop the service relationship with the public.

**Method**

Each aspect of waste, recycling & street cleansing service provision and policies will be considered. The services deemed most important are assessed first. As this is a service partnership, both evidence and expertise will be drawn in from across all Authorities and Kier as the contractor. Evaluating the policies used by the Authorities helps to identify best practices and allows the sharing of ideas.

**Equalities Impact Assessment**

Customer Contact &Communications

Level of Importance : HIGH

Each Authority offers the usual forms of contact with the public. Customers can make contact by telephone to their respective Authorities Customer Contact centre. Postal addresses are published to allow communication by post.

Each of the Authorities have websites which allow customers online access to information in relation to the Joint Waste Contract and provide detailed webpages on waste and recycling services under the contract. This includes the abiltiy to look up collection information or download and print collection calenders.

Eastbourne, Wealden and Rother have built in language translator on their websites that allow pages to display in other common languages. The Hastings website is compatible with assisted technology browsers (e.g. WebbIE, DAISY etc). All sites have the functionality to increase font size to aid individuals with partial sight. Leaflets and documentation with larger print are also accessible from all Councils on request; the same documentation is also available in braille.

The Eastbourne, Wealden and Rother sites also have audible systems which allow web pages to be read out loud and help:

* people with visual impairments
* people with learning or literacy difficulties such as dyslexia
* those for whom English is not their first language

All Authorities are able to receive calls using text relay where customers have access to a textphone (minicom).

Each of the Authorities provide internet access to their sites within their main office reception areas for use by people who need it.

With more people on the move and using smart devices there is a growing need to provide more convienient methods of communication. The Report it App which Eastbourne have implimented allows residents to make reports directly to Eastbourne Council’s CRM system (and from there into the Kierway system for action).

Social media (twitter, facebook and similar) offer opportunities to deliver information direct to an individuals phone or tablet device.

**Areas for improvement**

The multi channels of communication provided across the partnership are evidence that all Authorities provide excellent access to their services catering for all of the population.

All four councils have made improvements to their websites since 2012 resulting in more user friendly sites, simplifying the layouts and making navigation to services easier. Website functionality has also improved with “report a service problem” functions now enabled and compatible with assistive technology (e.g. web browsers designed for use by people with visual impairment).

Waste and Dry Recycling Collection Services

The provision of a collection service for domestic waste is a statutory duty restricted to those who have paid Council tax. A mixed dry recycling collection with separated glass is also provided.

The materials are collected as follows;

Domestic waste, 180L wheeled bin container

Dry Mix recycling, 240L wheeled bin container

Garden Waste, 240L wheeled bin container

Kerbside glass recycling, 45l box container

The provision is only restricted by access to the property and space on site however each Authority is willing to work with the property owner to find the best possible solutions for bin storage and collection. Both residual and dry recycling containers are provided free of charge to allow residents to use the service.

Garden Waste Services

Garden waste collections are not provided as a standard collection service across the whole partnership area.

Hastings and Rother (as of June 30th 2014) charge an annual fee to customers who want garden waste collections. Both Councils deem their annual subscription charge an appropriate contribution towards the cost of providing the collection service. The Garden waste collection is not a statutory duty so although it could be suggested the charge restricts the service to those who can afford it, alternative means are promoted (e.g. home composting).

Eastbourne and Wealden do not charge for garden waste collections so residents in those areas register to receive Garden waste collections.

Assisted Collections

Level of Importance : HIGH

Some residents are unable to present their containers at the designated collection point. Each Council provides an assisted collection service under the terms set out in the Joint Waste Partnership Policy Guidance.

Assisted Collection services are provided to residents who meet the following criteria.

* a resident is genuinely incapacitated or disabled, either temporarily or permanently;
* there is no other able-bodied person living in the same property;
* there is no one else who will help to move wheeled bins and recycling boxes to the collection point;
* a resident agrees to a permanent alternative collection point; and
* a resident is able to provide proof of incapacity (registered disabled or from a Healthcare Professional).

If at any time a Council deems that a resident no longer meets the criteria set out above they can contact the resident and withdraw the assisted collection unless the resident is able to verify their requirement.

As circumstances change over time each Council maintains the right to periodically review all assisted collections and householders will be required to reaffirm their need for an assisted collection if requested.

When a customer is approved for assisted collections the customer is considered vulnerable so care is also taken for collections to be carried out with discretion, their containers are both collected and then returned to an agreed collection point within the curtilage of their property.

**Areas for improvement**

During 2013 there has been a rise in the number of missed assisted collections across the partnership area. Data on the properties which have assisted collections are recorded in Kierway (waste management system) which is accessed by the crews using in cab devices. This is considered an appropirate way to identify the assisted properties and there should be no need for further measures of idenfication. Visibly marking bins would be inappropriate and could put potentially vunerable people at risk from imposters etc. Across all Councils work is being done to identify repeated missed assisted collections and working closely with Kier to ensure service is provided to those who need it.

Clinical Waste Collections

Level of Importance : HIGH

Residents across the Partnership area who require a service for the collection of Clinical waste. Within the Partnership Policy Guidance there is definition of what classfies as Clinical waste or Offensive waste.

Clinical waste (waste classification EWC 18 01 03) that is collected separately includes materials that are deemed infectious or potentially infectious, and “sharps”.

Offensive waste (waste classification EWC 18 01 04) is collected as a material within normal household residual waste. Occasionally waste officers (supervising officer) will approve the collection of offensive waste as part of the clinical waste service if the customer is particularly vulnerable.

All resident are required to complete a duty of care notice which records their requirement, the type of clinical waste to be removed and is certified by their GP or other appropriate healthcare professional.

It is essential that this service is performed with discretion and collections are maintained to schedule, providing replacement sharps boxes and clinical sacks where required.

It is the responsibility of each Council to keep a record of the duty of care notices and maintain them with the utmost confidentiality due to the personal and sensitive nature of the information.

Bulky Waste Collections

Level of Importance : MEDIUM

The bulky waste collection is provided for the removal of items unsuitable for removal under the Residual Waste Collection Service

The removal of bulky items is a charged service across the whole Partnership area. However each Authority have their own rates.For the service Eastbourne Borough Council offer an exemptionfor older residents from being charged for bulky collections.

Rother, Wealden and Hastings do not provide the same exemption and this could be considered an unfair variance across the Partnership area.

Assisted collections can be provided for bulky waste. This is at the discretion of each Council to consider the needs of the resident when the collection is requested.

Where Kier (Contractor) operatives enter a property to make an assisted bulky collection it is important that they clearly identify themselves and ensure that they arrive onsite when arranged.

Currently bulky waste service incur greatest dissparity between Authorities. Going forward as a Partnership work is required to enable the service to be provided equally to all residents.

Containers provided for Collections

Level of Importance : MEDIUM

Under the Joint Waste Contract there are a variety of containers provided to store residual waste and recycling. The containers vary in size to help support the indvidual requirements of residents and/or the space available at location for storage.

The presentation of multiple containers along the highway for collection can restrict pedestrian access and pose a general hazard,especially during windy weather. Residents are asked to minimilise the the time their container is left out for collection but operational flexibility is needed to allow collections to take place after 7am on collection day.

This variation of containers has to be limited and wherever possible standardised to ensure the collection can be performed in line with health and safety requirements that are in place to protect both the Contractor and the public.

A key aim of the Partnership is to reduce levels of residual waste and promote recycling. This aim is supported by the provision of smaller containers to limit the volumes of residual that can be presented for collection and allowing larger containers for recycling.

The Partnership Policy allows for circumstances when the standard size residual bin is not sufficient to meet the needs of a household. These circumstances are set out in the policy guidance as follows.

* Five or more people permanently living in the household.
* A household containing two or more children of pre-school age in disposable nappies.
* Residents with medical needs that generate type 18 01 04 waste (“offensive” medical waste, such as incontinence pads, stoma bags etc.).

The householder is required to confirm that they meet one or more of the above criteria to qualify for larger and / or additional containers and the Councils regularly review the need.

Lastly in assessing the provision of larger or additional containers in this Contract it is important to identify that the improvements to recycling collections allowing a larger number of materials to be recycled has aided households who were in need of additional residual capacity.

Visually impaired residents may have difficulty in determining which materials go in which container. Due to the natue of the service the containers are standardisied by colour to identify the collection type, (which is the same across the Partnership area). In these situations where the resident may find it hard to distinguish between containers the advice for residents is to mark or place boxes and bins so as to be familiar with the purpose of each container.

Employment

Level of Importance : HIGH

Both the Councils and the Contractor have a range of employment policies in place and adhere to UK Employment legislation including the Equalities Act. Staff regularly engage with each other during the course of their work in office, depot and street environments.

Access to Offices and Depots

All Council buildings have wheelchair access and electronic doors to insure easy access. Accessible toilets are provided at all sites excempt the Aquila Offices (Hastings). The Wealden Offices at Vicarage Lane, Hailsham have onsite accessible parking. The Hastings sites (Aquila House and Town Hall) due to their central town location are restricted but do have some limited assessible parking close by. The Rother Offices at the Town Hall have accessible parking located in the carpark at the front of the Town Hall.

The depots are restricted to the general public and are only accessible on strict authorisation and accompanied at all times onsite. This certainly would not be encouraged due to the nature of the site and for any reason the public wish to meet with the Contractor it would be agreed at a safer location i.e. the residents home or at the local Council Offices. Council officers are authorised to visit depots but must comply with site rules and the need to wear appropriate PPE.