

9. Governance

Related party transactions and hospitality

- 9.1** Related party transactions of officers and members will be reported as necessary in the Authority's statutory accounts in September 2018.
- 9.2** Staff must declare any relevant interests or offers of hospitality. During 2017-18 there was one declaration of interest, 16 offers of hospitality were received of which nine were accepted and seven refused.

Data protection

- 9.3** The Authority renewed its registration as a data controller with the Information Commissioner's Office (ICO) for the start of January. The Authority has not received any data subject access requests for personal information held.
- 9.4** The General Data Protection Regulations (2016/697) (GDPR) were made on 27 April 2016 and come into force on 25 May 2018. During 2017-2018, the Authority has been preparing policies, procedures, process notes and other measures to ensure compliance with the GDPR. These include the following:
- mapping out the personal data held by the Authority and creating data registers of all personal data following the template approved by the Information Commissioner;
 - putting in place appropriate policies, procedures and process notes on obtaining personal data from individuals and data breach procedures;
 - implementing organisational measures for data security; and responding to data subject rights under the GDPR;
 - updating the 'Privacy Notice' and 'Data Retention Policy' of the Authority;
 - carrying out contract audit and issuing contract variation notices to reflect the GDPR contract conditions to contractors that hold personal data on behalf of the Authority;
 - updating data protection clauses in template contracts to incorporate the GDPR mandatory clauses;
 - training of members of staff on the requirements of GDPR and implications for the Authority; and
 - appointing a Data Protection Officer.
- 9.5** The Authority has been liaising with LB Haringey - as the provider of IT services, LB Camden - as the provider of HR services, and officers with regard to the required IT and employee policies, which the Authority will need to review and follow to meet requirements of GDPR.
- 9.6** NLWA intends to continue in-house training for key members of Authority staff that deal with data protection issues on a day to day basis in 2018. The Data Protection Officer will have overall responsibility for ensuring compliance with the GDPR working with the Head of Legal and Governance and reporting directly to the senior management of the Authority.

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Freedom of Information and Environmental Information Regulations

9.7 The Authority normally responds to requests for information under the Environment Information Regulations because of the subject matter of the Authority's work. In 2017-18, 22 requests for information were received, of which 10 were responded to within the statutory 20 working days legislation. An extension was required to the time to respond to 12 responses, of which six requests for information related to NLWA's policy on the acceptance of charity shop waste at reuse and recycling centres (RRCs). Other requests were for a significant volume of material or required liaison with other Authorities. Where an extension is required there is ongoing communication with the person requesting information. There was one enquiry open at the end of the year (March 2018). In addition there were no appeals against refusal to release information and no complaints were made to the ICO regarding requests for information made to the Authority.

Equality objective

9.8 A single equality objective has been set in compliance with the 'Equality Act 2010 (Specific Duties) Regulations 2011'. As the Authority has a single waste disposal function, officers have determined that a single equality objective is appropriate. The objective is then broken down so that it reflects the broad categories of activity across the Authority, with measurable outcomes for each category of activity. NLWA will ensure that due regard is had to the Public Sector Equality Duty (PSED) set out in section 149 Equality Act 2010 - the elimination of discrimination, harassment and victimisation, the advancement of equality of opportunity and the fostering of good relations between people who share a relevant protected characteristic and those who do not - in the delivery of the objective and measurable outcomes.

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9.9 The objective is:

Equality objective	We will aim to ensure that we provide a waste disposal service that is fair, open to all and promotes equality of opportunity.
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The measurable outcomes are:

Authority's activity	Measurable outcomes
Waste disposal procurement and contract management	Ensuring that any contractors appointed are capable of complying with the duty, understand their obligations, and meet the duty in practice.
Communications and partnership working with boroughs	Ensuring that all printed communications are also available online - so that the size of the document is scaleable - and that all imagery used in online communications and websites includes image titles that are understandable when used by screen readers. Ensuring that communications from the Authority are accessible to all. Ensuring that an equalities section is included in the annual communications strategy
Waste prevention outreach and campaign work	Ensuring accessibility of activities and events to people with the relevant protected characteristic and encouraging participation from under-represented groups.
RRCs, visitor centres and other public facing services	Ensuring accessibility of sites and that reasonable adjustment is made for disabilities.
North London Heat and Power Project (NLHPP)	Ensuring that buildings constructed for the NLHPP are accessible to people with disabilities.

9.10 The Authority does not employ members of staff directly. All Authority staff members (currently 26 Full Time Equivalent) are employed by LB Camden and seconded to the Authority. The requirements of the 2017 regulations relating to employee data is to be met by LB Camden as the employer.

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9.11 The equality objective was reviewed in 2017-18 and is reviewed every four years as required by the 2011 Regulations - the next review is due in 2021-22. The following activities or actions have contributed towards meeting the equality objective:

- contracts entered into in the last year by the Authority have contained suitable equality obligations on contractors to not discriminate in relation to the provision of services to the public and to employment practices in relation to their staff; where appropriate, procurement procedures include a check of tenderers' equality policies;
- waste prevention work has continued to reach a wide range of audiences with presentations adapted if required and all venues used for events are fully accessible;
- a review is being undertaken of the 'Swish and Style' clothes swap events to ensure that everyone attending these events has an equal opportunity to collect clothing for free; any recommendations resulting will be incorporated into the 2018-19 contract for this programme of activity;
- videos on the Authority's 'Save Our Stuff' communications campaign website have been updated to include subtitles;
- a review of the Authority's brand guidelines has been completed to ensure continuing compliance with the public sector equality duty and compatibility with the Authority's equality objective; and
- a ramp is available at Berol House to enable wheelchair users access to the Authority's offices.

Risk

9.12 NLWA has a high level risk register which is reviewed by the Authority in September each year. The Authority's arrangements for managing risk are fully reviewed each year by the Members Finance Working Group (MFWG) and were reported to the 28 September 2017 meeting of the Authority - the report can be viewed on the Authority's website. The risk review led to an update to reflect the need for arrangements to be put in place in the absence of a Managing Director, and the fact that the Development Consent Order for the new residual waste management facilities had been granted. No new risks were identified. A high level risk register for LondonEnergy Ltd was also reviewed.