

9. Governance

Related party transactions and hospitality

- 9.1 In order to demonstrate accountability, transparency and impartiality to local taxpayers, the North London Waste Authority (NLWA) (the Authority) reports on any related party transactions of officers and members in the Authority's statutory accounts each year.
- 9.2 In addition, staff must declare any relevant interests and any offers of gifts or hospitality so that they can be recorded and made available to anyone who asks, and in order to prove impartiality in the Authority's business.
- 9.3 Chart 7 below shows the number of offers of gifts and hospitality in the past year compared to the previous three years. Officers record both the number accepted and the number refused, which are both shown in the chart below.



Chart 7

- 9.4 During 2018–19 there were no declarations of interest, compared to one in 2017-18.

Data protection

- 9.5 The Authority has a responsibility to protect any personal data which it processes in the course of its operations. This would include, for example, collecting feedback about events from residents. In January 2019 the Authority renewed its registration as a data controller with the Information Commissioner's Office (ICO).
- 9.6 The Authority has a responsibility to comply with all relevant aspects of the data protection regulations, including releasing details of any personal data held about an individual if they request it (a data subject access request). The Authority did not receive any data subject access requests for personal information held during the financial year 2018-19.
- 9.7 The General Data Protection Regulations (2016/697) (GDPR) came into force on 25 May 2018 and the Data Protection Act 2018 received Royal Assent on 23 May 2018 with most parts of the Act coming into force on 25 May 2018. Much of the work to prepare for the implementation of the regulations had been carried out in 2017-18. During 2018-2019,

9. Governance

the Authority continued to deliver a range of activity in order to ensure compliance with the new regulations, including:

- implementing organisational measures for data security, in particular, new photographic and film permission forms for activities throughout the year in compliance with the GDPR;
- updating the 'Privacy Notice' and 'Data Retention Policy' of the Authority;
- training members of staff on the requirements of GDPR and implications for the Authority; and
- appointing a Data Protection Officer.

9.8 The Authority 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 2019. The Data Protection Officer has 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.

Freedom of Information and Environmental Information Regulations

9.9 The Authority receives a range of enquiries about its operations as well as practical enquiries about recycling in particular – what can and cannot be recycled and why? The Authority responds to these requests as appropriate, with the aim of delivering an efficient response process and providing the information requested in as much detail and in the format requested. The Authority usually responds to requests for information under the Environmental Information Regulations (EiR) because of the subject matter of the Authority's work. In 2018-19, 34 requests for information were received. Although this is a 55% increase on the number received in 2017-18 the overall quantity of requests remains low.

9.10 Table 11 below compares the number of information requests received in 2018-19 compared to the previous three years. Table 11 also shows the proportion of requests responded to within the 20 working days statutory deadline. Whilst extensions to respond to requests can be made, the Authority aims to respond within 20 working days.

Number of EiR requests received and answered

	Within 20 days	More than 20 days	Total
2015-16	15	7	22
2016-17	25	1	26
2017-18	10	12	22
2018-19	28	6	34

Table 11

9.11 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.

9. Governance

Information Transparency Code

- 9.12** The Authority continues to publish information in accordance with the Information Transparency Code 2015 (Code) on its website at www.nlwa.gov.uk/governance-and-accountability/transparency-and-supplier-payments. This information includes details of all payments to suppliers for invoices greater than £500, the Authority's Standing Orders, and information on land and building assets that the Authority uses to deliver services. Information on senior employee salary details is also available in the annual statements of accounts to which there is a link on the webpage.
- 9.13** Officers have assessed the Authority's current compliance with the Code and can confirm compliance with the mandatory provisions.

Equality objective

- 9.14** A single equality objective has been set in compliance with the Equality Act 2010 (Specific Duties) Regulations 2011 (the 2011 Regulations). 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. The Authority 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.
- 9.15** 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. Working towards ensuring 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.

9. Governance

Waste disposal procurement and contract management	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.*

* Further detail is included in paragraph 9.17.

9.16 The Equalities Act 2010 (Specific Duties and Public Authorities) Regulations 2017/353 (2017 Regulations) was made on 9 March 2017 and came into force on 31 March 2017. The 2017 Regulations imposed reporting requirements on public authorities specified in schedule 2 and consolidated the new gender pay reporting requirements with the obligations under the 2011 Regulations. The Authority does not employ members of staff directly. All Authority staff members (currently 26 FTE) are employed by London Borough of Camden (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.

9.17 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 not to 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 venues selected to be fully accessible. A variety of venues and times for presentations was also used to ensure that a wide range of audiences was reached;
- the format of the 'Swish and Style' clothes swap events was reviewed and subsequently adapted to ensure that people with mobility difficulties have an equal opportunity to collect clothing for free;
- in waste prevention activities the community benefit society, Life After Hummus received Authority funding to deliver 14 Food Waste Cooking Club Socials and four London Clothing Swap events. The objectives of Life After Hummus are specifically to pioneer nutrition and lifestyle intervention solutions to improve the physical and mental health of the public, reduce health inequalities, tackle food poverty and reduce social isolation;
- an equalities section was included in the 2018-19 communications strategy setting out how the Equalities Act 2010 will be met;
- all new videos on the Authority's website have been filmed to include subtitles;
- all printed communications are made available online so that the size of the document is scaleable and all imagery used in online communications and websites includes image titles that are understandable when used by screen readers;
- the Communications team continues to ensure that online and printed communications material is fully accessible.

9. Governance

- In relation to the NLHPP: Accessibility requirements were incorporated into the master plan for the NLHPP, and the individual designs for the Resource Recovery Facility (RRF), EcoPark House and the Energy Recovery Facility (ERF). Some examples are:
 - Distributed accessible parking spaces across the NLHPP site (at the southern entrance, adjacent to EcoPark house, within the central car park, and adjacent to the ERF office entrance at the north).
 - Seating incorporated into the accessible pedestrian route from EcoPark House towards the ERF visitor areas.
 - Covered walkways incorporated into the accessible pedestrian route from EcoPark House towards the ERF visitor areas.
 - Accessible signage and way-finding principles have been incorporated into the site-wide way-finding strategy.
 - Level access routes have been incorporated between the central car park and the primary building entrances for EcoPark House and the RRF.
 - Lift access both in the RRF offices, the RRF Crows Nest, EcoPark House, and the ERF offices and visitor platform.
 - Automatic opening doors to the main building entrances to enable wheelchair users to enter without discrimination.
 - Internal people-occupied spaces have been designed to allow for minimum clear areas for wheelchair manoeuvring.
 - All fire stairs have been designed with a refuge on each floor.
 - Internal door layouts have been designed to allow for approach clearances for less mobile people.
 - Accessible WCs have been provided in every building, and accessible showers and changing areas have been provided where required.
 - Material specification has taken into account requirements for colour contrast strips, non-slip requirements, lighting and acoustics.
 - An Equalities Act compliance review has been undertaken for EcoPark House and RRF, recording design decisions for any future contractor to develop further.

Public Contracts Regulations 2015

9.18 From 18 October 2018, the use of electronic procurement became mandatory under regulation 22 of the 2015 Regulations. The Authority's Contract Standing Orders further require the electronic submission of tenders from October 2018. The Authority is compliant with this requirement and all procurements are now carried out using an e-procurement system that meets the requirements in the 2015 Regulations.

Modern Slavery (Transparency in Supply Chain) Bill

9.19 The Modern Slavery (Transparency in Supply Chain) Bill (Bill) had its first reading in the House of Lords on 12 July 2017. The Bill included a section requiring public bodies to be included within the requirement of section 54 of the Modern Slavery Act 2015 to publish a slavery and human trafficking statement. It also requires contracting authorities to exclude from procurement procedures those economic operators who did not provide such a statement. Public body is to be defined as a contracting authority within the meaning of the Public Contracts Regulations 2015. Officers have monitored the progress of the Bill through the Houses of Parliament and the latest news published on the House of Parliament website states that the date for the second reading in the House of Lords will be announced. No date has been announced as at the date of this report.

9. Governance

Risk

9.20 In order to protect the public interest, the Authority needs to identify, assess and manage risk. NLWA has a high-level risk register which is reviewed by the Authority each year. The Authority's arrangements for managing risk are reviewed each year by the Members Finance Working Group (MFWG) and were reported to the 7 February 2019 meeting of the Authority. The report can be viewed on the Authority's website - <http://www.nlwa.gov.uk/governance-and-accountability/authority-meetings/>. No new risks were identified.