

7. Governance

Related party transactions and hospitality

In order to demonstrate accountability, transparency and impartiality to taxpayers, NLWA reports on any related party transactions of officers and members in the Authority's statutory accounts each year. 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 to prove impartiality. In 2021/22 there were two offers of gifts and hospitality with one offer refused. This compares to 2020/21 when there were no offers of gifts and hospitality.

During 2021/22 there were no declarations of interest by officers, which was the same as in 2020/21. Declarations of interest by Authority Members which are relevant to items of business on the agenda of any formal meeting are recorded in the minutes of that meeting.

Data protection

NLWA 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 or taking photographs of people. In January 2022, NLWA renewed its registration as a data controller with the Information Commissioner's Office (ICO).

NLWA has a responsibility to comply with all relevant aspects of the Data Protection Act 2018 and the UK General Data Protection Regulation (and the General Data Protection Regulation up until 1 January 2021), 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 in 2021/22.

The Authority continued to deliver a range of activity in order to ensure compliance with the Retained Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018), including training members of staff on the requirements of GDPR and its implications. We will continue in-house training for members of staff who deal with data protection issues on a day-to-day basis. 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 Authority's Senior Management Team.

Freedom of Information and Environmental Information Regulations

NLWA receives a range of enquiries about its operations and the North London Heat and Power Project. We respond to these requests as appropriate, with the aim of delivering an efficient response and providing the information requested in the format requested. We usually respond to requests for information under the Environmental Information Regulations (EiR) because of the subject matter of the Authority's work.

In 2021/22, 51 requests for information were received, which is almost double the number of enquiries received two years ago. NLWA is a small organisation and, unlike local authorities, does not have a team dedicated to responding to enquiries. The table below compares the number of information requests received in 2021/22 compared to the previous two years. Whilst the deadline to respond can be extended for complex requests, we aim to respond within 20 working days, and have put measures in place to aim to increase the proportion of enquiries responded to within 20 days in the future.

Period	Within 20 days	More than 20 days	Total
2019/20	27	1	28
2020/21	22	15	37
2021/22	29	22	51

Table 6: EIR requests received and responded to

There were no appeals against refusal to release information. Two complaints were made to the ICO regarding requests for information to which the Authority was late to respond.

Information Transparency Code

NLWA continues to publish information in accordance with the Information Transparency Code 2015 on its website. Details can be found at nlwa.gov.uk/ourauthority/information-we-publish. This information includes details of all payments to suppliers for invoices greater than £500. The website also includes the NLWA'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.

Equality objectives

In compliance with the Equalities Act 2010 (Specific Duties and Public Authorities) Regulations 2017/353 (2017 Regulations), which requires equality objective(s) to be set and reviewed every four years, NLWA's equality objective was reviewed in 2021/22. Alongside the Authority's principal waste disposal objective, two further objectives have been added, relating to communications and the North London Heat and Power Project. These additional objectives are aligned with the Authority's broadening workload. The objectives are broken down so that they reflect 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 objectives and measurable outcomes.

Our equality objectives

- We will aim to ensure that we provide a waste disposal and waste prevention service that is fair, accessible to all and promotes equality of opportunity.
- We will aim to ensure that we implement the North London Heat and Power Project in a way that is fair and accessible to all and promotes equality of opportunity.

- We will aim to ensure that we communicate the activities of the North London Waste Authority in a way that is fair, accessible to all, and promotes equality of opportunity.

Authority's activity & measurable outcomes

Provide waste disposal and recycling services [through contracts with operators]:

We regularly audit the operating procedures and policies of all of our contractors to ensure they discharge their responsibilities in accordance with Equality Legislation and policies of the Authority. We monitor the application of these procedures and policies in action to ensure they meet expectations in reality.

Provide public-facing services through reuse and recycling centres:

We ensure our facilities are staffed adequately and those staff are trained to ensure any visitors that are less physically able are supported to dispose of their items in the most sustainable way.

Plan and coordinate services with boroughs for waste management from the current time to the long term:

We will consider with boroughs and through wider community focused consultation (including with those groups that represent the interest of residents with specific protected characteristics), the impacts our services have on the individual and we'll ensure appropriate adjustments are built in that provide equality of opportunity.

Take responsibility for the stewardship of assets owned by the Authority for the purposes of service provision: We ensure the accessibility of assets are assessed annually and reasonable adjustments are made for those with disabilities.

Promote positive behaviour by residents through outreach and campaigns which reduce residual waste: We carry out research to provide audience insight into communities across north London to identify the most effective routes to resident engagement and messaging that will motivate actions to prevent waste. We research and identify community groups which could take advantage of community grants but are not currently engaged with NLWA. We increase spend in marketing community grants to reach more people and provide support with applications to reduce barriers to participation.

Provide information to the public on the Authority's activities: We ensure accessibility and inclusion are part of communications planning process and campaign templates. We follow communications planning best practice and ensure communications is tailored to different audiences. We also use the Government Communications Service [guidance on accessible communications](#) to evaluate and inform our activities. We work with borough communications teams to amplify messaging and maximise the reach of our communications.

Deliver world class new facilities through the North London Heat and Power Project

(NLHPP): We plan to deliver Ecopark House in 2023, as a model community facility accessible to people with disabilities. We achieve participation in apprenticeships and on-site skills training from under-represented groups in the construction workforce, specifically BAME and female, in excess of current industry benchmarks. We monitor and verify the application of the London Living Wage as a uniformly applied minimum standard for on-site working across all contracts. We publish project material; newsletters, advertising for apprenticeships, etc., in an accessible format for at least two local communities for whom English is not the first language.

The 2017 Regulations impose reporting requirements on public authorities specified in schedule 2 and also impose gender pay reporting requirements on public sector employers with more than 250 employees. The Authority does not employ members of staff directly. All Authority staff members (currently 30 FTE) are employed by London Borough of Camden and are seconded to NLWA. The requirements of the 2017 Regulations relating to employee data is to be met by Camden Council as the employer.

Activities which contribute towards meeting our equality objectives

The following activities or actions have contributed towards meeting the equality objective:

- Contracts started 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 continued to reach a wide range of audiences though the year. Face-to-face outreach work was impacted due to COVID-19 restrictions for some months of the year. However, there were opportunities for individuals and groups to access information via NLWA on-line presentations and website during those periods of restriction.
- In compliance with The Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018, NLWA's website was adapted to meet Web Content Accessibility Guidelines version 2.1 AA standard. Work continues to achieve complete compliance.
- All printed communications are made available online so that the size of the document is scalable and all imagery used in online communications and websites includes image titles that are understandable when used by screen readers.
- NLWA's Communications team continues to ensure that online and printed communications material is fully accessible.

- Accessibility requirements were incorporated into the master plan for the North London Heat and Power Project (NLHPP) and the individual designs for the resource recovery facility (RRF), EcoPark House, and the energy recovery facility (ERF). By way of example, this includes:
- 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 Resource Recovery Facility (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 toilets have been provided in every building, and accessible showers and changing areas have been provided where required.
- Material specification has accounted for requirements with 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 procurement

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 carried out using an e-procurement system that meets the requirements in the 2015 Regulations.

Modern Slavery

The Authority works with Camden Council to meet the requirements of the Modern Slavery Act 2015. A link to its Modern Slavery statement is provided on the Authority's website and training on slavery and human trafficking provided by LB Camden is made available to our staff.

When conducting procurement, the Authority checks, as part of the selection stage, that potential suppliers have in place a slavery and human trafficking statement which complies with the law.

COVID-19

NLWA continued to deploy a range of measures to ensure compliance with COVID-19 related legislation and government guidance, including carrying out COVID-19 risk assessments, home-working risk assessments, and updating our office health and safety procedures as lockdowns eased. In compliance with Crown Commercial Services guidance, adjustments were made to various service contracts for the office to reflect the low level of occupancy.

Risk

To protect the public interest, the Authority needs to identify, assess and manage risk. NLWA has a high-level risk register which we review each year. Our arrangements for managing risk are reviewed each year by the Members Finance Working Group (MFWG) and were reported to the 22 April 2021 and 10 March 2022 Authority Meetings. A number of updates were made as a result. The reports can be viewed at: nlwa.gov.uk/ourauthority/our-meetings.