

# 7. Governance

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NLWA has a robust Governance Framework which includes clear organisational objectives, set out in its annual Business Plan and Joint Waste Management Strategy. The Standing Orders set out how decisions are made, whether by elected members or officers. Most member decisions are made in public on the basis of publicly available reports. Risks are dynamically managed through our risk register, which is reported to members at Authority meetings.

The Authority has strong systems of financial control, which include Camden Council's financial procedure rules and a robust annual budget setting process.

### Corporate Peer Challenge

In January and February 2023, NLWA underwent a Corporate Peer Challenge from the Local Government Association (LGA). The review highlighted that the Authority is in a positive position, where observations included strong leadership, effective external communications, an impressive construction programme, well-managed finances and high-calibre, responsive staff. There were areas noted where we can further our development as an organisation, which will be addressed in an action plan in 2023-24.

### Declarations of interests, gifts and hospitality

In order to demonstrate accountability, transparency and impartiality to taxpayers, NLWA reports on any 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. In 2022-23 there were three offers of gifts and hospitality, all valued at £50 or less.

During 2022-23 there were no declarations of interest by officers. 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 it processes during its operations. This would include, for example, collecting feedback about events from residents or taking photographs of people. In November 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 (UK GDPR), 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 in 2022-23.

The Data Protection Officer has overall responsibility for ensuring compliance with the UK GDPR and reporting directly to the Authority's Senior Management Team.

### Freedom of Information and Environmental Information Regulations

NLWA receives formal information requests about its activities under the Freedom of Information Act 2000 and Environmental Information Regulations 2004. In 2022-23, we received 27 information requests.

The table below compares the number of information requests received in 2022-23 with the previous two years. Whilst the deadline to respond can be extended for complex requests, we aim to respond within 20 working days in line with the regulatory requirements.

Period	Within 20 days	More than 20 days	Total
2020-21	22	15	37
2021-22	29	22	51
2022-23	24	3	27

**Table 6:** Information requests received and responded to

## Information Transparency Code

NLWA publishes information in accordance with the Information Transparency Code 2015 on its website. Details can be found at [nlwa.gov.uk/ourauthority/information-we-publish](https://nlwa.gov.uk/ourauthority/information-we-publish). We are working to refresh the information we publish to ensure that the latest information is available.

## 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 objectives were last reviewed in January 2022. We will ensure that due regard is had to the Public Sector Equality Duty (PSED) set out in section 149 Equality Act 2010 in the delivery of the objectives and outcomes. Our equality objectives are:

- 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.

## Our activity and 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 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 ethnic minorities and women, 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.

#### **Activities which contribute towards meeting our equality objectives**

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

- Contracts awarded by the Authority contain 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 also include a check of tenderers' equality policies.

- Waste prevention work continued to reach a wide range of audiences through the year. Outreach with residents was delivered through a mix of approaches including in-person, print and digital information.
- Under its duty to comply with The Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018, NLWA's website meets Web Content Accessibility Guidelines version 2.1 AA standard.
- 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.
- We continue to incorporate accessibility requirements 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).
- We also work to promote the inclusion of women and ethnic minorities in the NLHPP's on-site construction workforce, as well as in on-site skills training placements and apprenticeships. In March 2023, the project launched a women in construction training programme led by Acciona, the contractor for the energy recovery facility, with the assistance of the Women into Construction community interest company and supported by several other partner organisations.

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 are employed by Camden Council

and the requirements of the 2017 Regulations relating to employee data is to met by Camden Council as the employer.

## Public procurement

NLWA's procurements are advertised and conducted in accordance with the Public Contract Regulations 2015 and our Contract Standing Orders.

## 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 Camden Council is made available to our staff.

NLWA regularly checks that potential suppliers have in place a slavery and human trafficking statement which complies with the law as part of its procurement processes.

## 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. In response to increasing responsibilities, we enhanced our approach to risk management in 2022-23 through the integration of relevant and appropriate risks from the NLHPP and LEL risk registers into the high-level register, to ensure awareness of organisational risks and priorities. The outcome of this approach is that both LEL and NLHPP have clear sight of NLWA's top risks which form a basis to ensure optimal resource allocation.

