

NOTICE OF MEETING

CABINET MEMBER SIGNING

Tuesday, 3rd February, 2026, 12.00 pm - Alexandra house, Station Road, N22 7TY Y (watch the live meeting [here](#))

Members: Councillors Seema Chandwani

1. FILMING AT MEETINGS

Please note that this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a

pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

4. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items of Urgent Business will be considered under the agenda item where they appear).

5. DEPUTATIONS / PETITIONS / QUESTIONS

6. EXTENSION OF CONTRACT FOR THE PROVISION OF ENVIRONMENTAL ENFORCEMENT SERVICES VIA KINGDOM SERVICES GROUP LIMITED (PAGES 1 - 30)

7. EXCLUSION OF THE PRESS AND PUBLIC

Item XX is likely to be subject to a motion to exclude the press and public be from the meeting as *it/they* contains exempt information as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

8. EXEMPT EXTENSION OF CONTRACT FOR THE PROVISION OF ENVIRONMENTAL ENFORCEMENT SERVICES VIA KINGDOM SERVICES GROUP LIMITED (PAGES 31 - 32)

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Thursday, 29 January 2026

Report for: Cabinet Member Signing

Item number: To be added by the Committee Section

Title: Extension of contract for the provision of environmental enforcement services via Kingdom Services Group Limited

Report authorised by : Barry Francis

Lead Officer: Beth Waltzer, Head of Recycling, Waste and Enforcement

Ward(s) affected: All

Report for Key/
Non Key Decision: Key Decision

1. Describe the issue under consideration

- 1.1 This report seeks approval to grant the extension of the Environmental Enforcement Services contract (the Contract), awarded to Kingdom Services Group Limited (Kingdom) following a competitive open procurement process, for a further 12 months from 6th February 2026.
- 1.2 The Services provided by Kingdom are cost neutral, and provides specific officer to support existing council enforcement services to issue fixed penalty notices (FPNs) under the relevant legislation including the Environmental Protection Act 1990, Anti-Social Behaviour, Crime and Policing Act 2014 and Highways Act 1980, for fly-tipping and littering, anti-social behaviour and other offences.

2. Cabinet Member Introduction

- 2.1 n/a

3. Recommendations

- 3.1 It is recommended that the Cabinet Member for Resident Services & Tackling Inequality:
 - 3.1.1 approves the 1-year extension of the Environmental Enforcement Services contract with Kingdom Services Group Limited in accordance with CSO 2.01(d), and
 - 3.1.2 notes that the cost of the services will continue to be cost neutral, as the income generated through FPNs is transferred to the Council, with 34.5% being shared to Kingdom to offset the cost to deliver the services.

4. Reasons for decision

- 4.1 Litter and fly-tipping are amongst the biggest concerns for the residents of Haringey, and the issues are noticeable across the borough. Education and

enforcement have a significant role to play in reducing the amount of litter and fly-tipping on our streets and changing people's behaviours and attitude.

- 4.2 Engagement undertaken in 2023 with approximately 9k residents, businesses and community groups revealed that 96% of all respondents strongly agreed or agreed with fining people for fly tipping and 94% of respondents agreed with fining people for dog fouling or littering.
- 4.3 Under the 'A cleaner, low waste Haringey' theme of the Council's Corporate Delivery Plan 2024 - 2026, the Council has set an activity for 'Enhanced environmental enforcement, including targeted deployment (Monday – Sunday) of proactive litter & waste enforcement patrols in Town Centres and hot spot locations across the borough'.
- 4.4 The services provided by Kingdom provides enhanced enforcement to the council's in house service via provision of dedicated officers to undertake enforcement across three areas, which include: Observed Offence (such as dropping litter), Investigated Offence (such as fly-tipping) and Duty of Care offence (such as businesses not correctly managed their waste).
- 4.5 During the first 8 months of the contract, Kingdom have issued approx. 9000 FPNs. 78% for observed offences, 17% for investigated offences and 5% for Duty of Care offences.
- 4.6 It is currently too early to undertake a full analysis of the impact on fly-tipping and litter levels, however the launch of the 'Don't Mess with Haringey' campaign and having a visible enforcement presence will show that the Council is taking environmental crime seriously.
- 4.7 Extending the Contract with Kingdom, will allow the council to continue deliver on its environmental and regulatory enforcement obligations and commitments. It will also allow the council's internal waste enforcement officers to concentrate on more preventative measures including prosecutions as well as other environmental enforcement issues which we know matter so much to our residents.

5. Alternative options considered

- 5.1 The Council could do nothing, allowing the contract with Kingdom to expire. This would mean the Council has less resource to undertake enforcement action against those who are purposefully dropping litter and dumping waste across the borough. Without education and a deterrent, this could lead to an increase in instances of littering and dumping waste across the borough. Dumped waste and littering incurs financial costs in terms of both collection and disposal.
- 5.2 Not extending the contract has impacts on other services, such as the street cleansing as more resources are required to collect litter and dumped waste as well as impacting on the satisfaction of residents, businesses and visitors.

- 5.3 This would mean that the Council does not complete an activity as set out within the Corporate Delivery Plan 2024 – 2026. Therefore, this is not recommended.
- 5.4 The Council could not grant the 1-year extension and undertake all enforcement action in-house. This service was delivered by Haringey officers exclusively between 2018 – 2024 and demonstrated that it was unable to meet its full potential due to the continued volume of demand. If the extension is not approved the ability to tackle and reduce environmental crimes will be reduced. Therefore, this is not recommended.

6. **Background information**

- 6.1 In 2023, residents revealed overwhelming support for tougher measures on those who don't look after our borough. 96% of residents backed fines for fly-tipping and 94% supported penalties for dog fouling and littering. Businesses and community organisations also expressed strong agreement, with 83% in favour of penalties for fly-tipping.
- 6.2 In 2024/25 following a competitive procurement process, a contract to deliver environmental enforcement services was awarded to Kingdom in November 2024 and commenced on 5th February 2025.
- 6.3 The Contract allows the Council the right to extend the Contract with Kingdom for a further year.
- 6.4 The contract has delivered a number of benefits, which include:
 - A specialised core business provider of litter, fly tipping and other environmental offences.
 - Delivering on a cost neutral basis for enhanced resources
 - Direct access to experts, with years of experience
 - A proven digital solution for recording FPNs, interviews and evidence
 - The ability to undertake identity checks at the point of issuing an FPN
 - A back-office support function, which has expertise using technology developed over multiple contracts which in house officers also have access to
 - Enabling in-house officers to focus on prosecutions and other environmental enforcement issues
 - Enabling the council to continue with a zero tolerance to fly tipping and litter, supporting the objectives of the 'Don't Mess with Haringey' campaign
- 6.5 During the first 8 months of the Contract Kingdom have issued approx. 9000 FPNs, which include:
 - 6.5.1 78% for observed offences (such as dropping litter),
 - 6.5.2 17% for investigated offences (such as fly-tipping), and
 - 6.5.3 5% for Duty of Care offences (such as business not having suitable waste collection provision).
- 6.6 42% of upheld FPNs have been paid, with an approx. Total value of £650,000. Kingdom have received a share of approximately £150,000 (34.5%), whilst the Authority has retained £500,000.

- 6.7 The number of paid FPNs is expected to increase, due to a number which are not yet due becoming due, and those which have not yet been paid, but are past the due date moving to prosecution
- 6.8 Kingdom produces the required documentation for the Council to pursue those who haven't paid, with the first set of prosecutions starting in November 2025 under the Single Justice Procedure.
- 6.9 Although reducing the amount of littering and fly-tipping across the borough is the key priority of the Contract, it is not yet possible to determine the impact of Kingdom's actions, due to delays in data reporting and the impact of the 'Don't Mess with Haringey' campaign.

7. Contribution to the Corporate Delivery Plan 2024-2026 High level Strategic outcomes'

- 7.1 This decision relates to the Responding to the Climate Emergency theme of the Corporate Delivery Plan, specifically supporting the outcome areas of A cleaner, low waste Haringey.
- 7.2 This service is set out as an Activity within the Corporate Delivery Plan, to enhance environmental enforcement, including targeted deployment (Monday – Sunday) of proactive litter & waste enforcement patrols in Town Centres and hot spot locations across the borough.
- 7.3 There is an MTFS target associated with the enforcement service - £50,000 2026/27 and £50,000 2027/28

8. Carbon and Climate Change

- 8.1 Although the decision does not have any direct impact on carbon emissions or a reduction in climate change, it should be considered as being beneficial to responding to the climate emergency.
- 8.2 The services aim to reduce the amount of dropped litter and dumped waste that is on our streets. This in turn will continue to have a positive impact on the local environment.

The team delivering the services travel around the borough using public transport and on foot reducing transport related emissions.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities) Finance

- 9.1 The report seeks Cabinet approval to extend the current contract with Kingdom Services Group Limited for the provision of enforcement services to issue fixed penalty notices (FPNs) under the relevant legislation including the Environmental

Protection Act 1990, Anti-Social Behaviour, Crime and Policing Act 2014 and Highways Act 1980, for fly-tipping and littering, anti-social behaviour and other offences.

- 9.2 The extension to the contract will commence on the 6th of February 2026 for 12 months. The contract is expected to generate circa £650k for the year, out of this income, 65.5% will be paid to the Council and the balance will be retained by Kingdom to cover their expenses. The expectation is circa 42% of the FPN issued would be paid in order to achieve the expected income of circa £500k per annum to the Council. The contractor is optimistic the 42% would increase after commencing prosecutions in November 2025.
- 9.3 There are no risks envisaged to the Council as all risks associated with the contract are transferred to the third-party contractor.

10. Procurement

- 10.1 The contract for the provision of environmental enforcement services with Kingdom Services Group Limited was duly tendered and awarded in compliance with the Public Contracts Regulations 2015.
- 10.2 Under these regulations, any contract modification—such as an extension—would ordinarily require a new competitive process unless it falls within the scope of Regulation 72. This provision permits certain modifications, regardless of value, where they were expressly anticipated in the original procurement documents, such as an option to extend, which applies in this instance (Regulation 72(1)).
- 10.3 In alignment with CSO 2.01(d), the request for a contract extension under the existing terms may therefore be approved.

11. Director of Legal & Governance (Monitoring Officer)

- 11.1 The Director of Legal and Governance has been consulted in the preparation of this report. Legal Services has been advised that the original procurement was conducted in accordance with the Public Contracts Regulations 2015 (the Regulations) and that provision for an extension was included in clear, precise and unequivocal review clauses in compliance with Reg 72 (1) (a).
- 11.2 Where the Leader has agreed, the Cabinet Member has power to approve decisions which would normally be taken by Cabinet (CSO 0.08).
- 11.3 The Director of Legal and Governance (Monitoring Officer) confirms that there are no legal reasons preventing the Cabinet Member for Environment and Resident Experience from approving the recommendations in this report

12. Equality

- 12.1 Enforcement action is taken against individuals and businesses based on illegal actions being witnessed by enforcement officers or evidence is identified through investigative work proving beyond reasonable doubt that an offence has been

committed. Services are not targeted at individuals based on protected characteristic as it is evidence driven.

12.2 All officers undertake mandatory 4-day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. The representation process also exists if vulnerable individuals are not known of at the time of issuing. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

12.3 Operation Control Centre will be responsible for spot checking 20% body worn cameras footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct. In addition, all action carried out by Kingdom officers are recorded and saved into the LAS Access system. This includes offence type, location, age and ethnicity of the individual. This is fully accessible to the councils recycling, waste and enforcement team. Data is monitored, quality checks are undertaken and performance reports produced and discussed at monthly contract liaison meetings.

12.4 A full EQIA has been completed – See Appendix 2

13 Use of Appendices

Appendix 1 - Exempt Part B
Appendix 2 - EQIA

14 Background papers

N/A

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Extension of contract for the provision of environmental enforcement services via Kingdom Services Group Limited
Service Area:	Recycling, Waste and
Enforcement	
Officer Completing Assessment:	Richard Gilbert
Equalities Advisor:	Diptasri Basu
Cabinet meeting date (if applicable):	20 th January 2026
Director/Assistant Director	Barry Francis

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: potential positive and negative equality impacts
- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may include: if/when the EQIA will be refreshed, planned consultation, future stages of the project).

Environmental enforcement services are statutory services delivered by all local authorities in the UK. In 2024 Haringey Council, following a competitive tender process, awarded a contract for the provision of environmental enforcement services to Kingdom Services Group Ltd (Kingdom). This was to support the existing in house enforcement team to tackle illegal activities in three areas which include Observed Offence (such as dropping litter), Investigated Offence (such as fly-tipping) and Duty of Care offence (such as businesses not correctly managed their waste).

Environmental enforcement services target those who commit offences under the Environmental Protection Act 1990 (EPA), the Anti-Social Behaviour, Crime and Policing Act 2014 and Highways Act 1980. The aim of these services is to identify the perpetrators of illegal actions, make them aware that these are not acceptable, and where needed issue fixed penalty notices (FPNs). This enforcement activity seeks to change these negative behaviours to improve the borough's local environment, reduce demand on council waste and cleansing services, and save costs and resources. The contract with Kingdom is delivered via a cost neutral model.

Enforcement officers are deployed across the borough and action is taken against those individual and/or businesses that are either observed or through investigative work undertaken to gather evidence found to have committed an offence. An intelligence led approach is taken to deployment of resources, ensuring that resources are focused where positive community impact is the greatest including improving the local environment, the quality of life of all residents, inward investment opportunities and the perception of the borough and council. Protected characteristic data/profiles are not used to inform officer deployment.

Where enforcement officers, including contractors, are engaged, they act under Council authorisation and oversight. All Kingdom officers are recruited via a ISO90001 certified procedure, with a focus on recruiting staff from within Haringey working with colleagues in Haringey Works to advertise opportunities and source candidates, ensuring the workforce reflects the borough's diverse population. All officers receive mandatory CPC accredited training. This comprehensive 4 day training includes modules covering equality and diversity, safeguarding and recognising vulnerability to ensure services are delivered in a compliant and effective manner, following the law and Council policy.

Should an individual feel that they have been unfairly targeted by the enforcement service they have the right to make a formal representation setting out the reasons as to why they feel the action taken to be unjust. These are considered by qualified Kingdom staff and upheld where there is a justification.

All action carried out by Kingdom officers are recorded and saved into the LAS Access system. This includes offence type, location, age and ethnicity of the individual, this is fully accessible to the council's recycling, waste and enforcement team. Data is monitored, quality checks are undertaken and performance reports produced and discussed at monthly contract liaison meetings.

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

The contract for the provision of environmental enforcement services via Kingdom provides additional resources to deliver statutory services already undertaken by the council to better meet demand, contribute to the delivery of a cleaner borough, and improve local environmental quality.

No direct consultation or engagement for the award of this contract was required. However, in 2023/24 a borough wide consultation with residents, community groups and businesses on waste, street cleansing and enforcement services was carried out as part of the integrated waste services contract procurement.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

The 9000 responses received from the engagement showed overwhelming support for stricter measures to tackle fly tipping and illegal waste dumping, with 96% of residents in favour of imposing fines to fly-tippers, while 94% supported penalties for littering and dog fouling. Local businesses and community organisations also voiced their concerns, with 83% backing fines to combat fly-tipping.

The increase in environmental enforcement resources through Kingdom to support the councils existing team responds to the outcome of this consultation in relation to environmental enforcement.

As part of the consultation, the Bridge Renewal Trust were commissioned to carry out a series of workshops with and promote the online survey channel to groups not always well represented though statistical analysis on exact groups is not available. Workshops were carried out in Broadwater Farm, Northumberland Park, Hornsey and Wood Green. The online survey was actively promoted to groups including Somali women, Turkish, Kurdish and Cypriot communities, Latin American communities, younger and older people, and faith groups.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough>.

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data

Borough Profile¹

- 54,422: 0-17 (21%)
- 71,660: 18-34 (27%)
- 63,930: 35-49 (24%)
- 46,516: 50-64 (18%)
- 27,706: 65+ (10%)

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

During the first 8 months of the existing contract with Kingdom the number and percentage of FPNs issued to individuals by age group is set out in the table below:

Age Profile	Number of FPNs Issued	Percentage of FPNs Issued
18	4	0.04%
19	15	0.17%
20 - 29	1040	11.46%
30 - 39	1768	19.47%
40 - 49	1187	13.07%
50 - 59	795	8.76%
60 - 69	312	3.44%
70 - 79	60	0.66%
Not Provided	3898	42.93%

¹ Census, 2021 – [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

This data is monitored and corresponds closely to the borough profile. This data also includes FPNs issued to individuals committing offences within Haringey who may not reside in the borough.

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against those under 18 years of age.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

The age profile for FPN's issued does not provide enough information to confirm/deny the above statements as age does not have to be given when issuing an FPN.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).
- **Age and Low Income:** While not a protected characteristic itself, low income is often an outcome of having one or more protected characteristics, such as being an older person or having a disability. Residents on low incomes may struggle to pay for waste collection services, leading to a greater risk of having their waste illegally handled by unregistered carriers or being forced to use less convenient disposal methods.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%²
 - Day to day activities limited a lot – 6.1%
 - Day to day activities limited a little – 7.5%
- 7.5% of residents people diagnosed with depression³

² Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandhealth/disabilityandhealthdisabilityinenglandandwales)

³ NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.england.nhs.uk/wp-content/uploads/2019/03/Prevalence-of-diagnosed-depression-among-GP-registered-population-age-18-19.pdf)

- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic. However, dumped waste can create significant physical hazards. Obstructions on public highways, such as large fly-tips or inappropriately placed domestic waste, can block access for people using wheelchairs or mobility scooters, and pose serious trip hazards for those with visual impairments.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Within the extended contract, we will include provision of data on number of representations and the acceptance rate in relation to any disabilities to analyse whether the service is disproportionately affecting people with disabilities.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?

Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

We do not currently hold information about disabilities in relation to FPN's issued. However, within the extended contract, we will include provision of data on number of representations and the acceptance rate in relation to disability to analyse whether the service is disproportionately affecting people by disability

⁴ NHS Quality Outcomes Framework – [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](https://fingertips.phe.org.uk/mental-health-diagnosis-among-gp-registered-population-age-18-)

⁵ PHE Learning disability profiles – <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. The representation process also exists if a hidden disability is not known at the time of issuing. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

Operation Control Centre will be responsible for spot checking 20% BWC footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Environmental enforcement services assist in the provision of a cleaner borough and less dumped waste by preventative measures. Positive impacts are detailed below:

- **Disability:** Dumped waste can create significant physical hazards. Obstructions on public highways, such as large fly-tips or inappropriately placed domestic waste, can block access for people using wheelchairs or mobility scooters, and pose serious trip hazards for those with visual impairments.

4c. Gender Reassignment

Data

Borough Profile⁶

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%
- Trans man - 0.1%

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

⁶ Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We do not currently hold information about gender reassignment in relation to FPN's issued.

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. The representation process also exists if vulnerable individuals are not known of at the time of issuing. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

Operation Control Centre will be responsible for spot checking 20% BWC footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There are no anticipated impacts of this policy on individuals with gender reassignment as a protected characteristic due to the specific characteristic itself. Enforcement actions are based on violations and Kingdom staff are provided with equalities training to undertake their assigned tasks.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

We anticipate a neutral impact on people with gender reassignment as a protected characteristic.

4d. Marriage and Civil Partnership

Note: Only the first part of the equality duty ("Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act") applies to this protected characteristic.

Data

Borough Profile ⁷

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)
- Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We do not currently hold information about marriage and civil partnership in relation to FPN's issued.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. The representation process also exists if vulnerable individuals are not known of at the time of issuing. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

⁷ Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

Operation Control Centre will be responsible for spot checking 20% BWC footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

We anticipate a neutral impact on people with this protected characteristic.

4e. Pregnancy and Maternity

Note⁸:

- Pregnancy is the condition of being pregnant or expecting a baby.
- Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Data

Borough Profile ⁹

Live Births in Haringey 2021: 3,376

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

⁸ Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](#).

⁹ Births by Borough (ONS)

We do not currently hold information about pregnancy and maternity in relation to FPN's issued. However, within the extended contract, we will include (where given) provision of data on number of representations and the acceptance rate in relation to pregnancy and maternity to analyse whether the service is disproportionately affecting people with this protected characteristic.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

Operation Control Centre will be responsible for spot checking 20% BWC footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

We believe the impact of enforcement will be positive. Pregnant individuals may face increased health risks from exposure to biological and chemical agents often found in illegally dumped waste, such as waste from food premises or animal processing sites.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.¹⁰

Data

Borough Profile¹¹

Arab: 1.0%

- Any other ethnic group: 8.7%

¹⁰ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

¹¹ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

Asian: 8.7%

- Bangladeshi: 1.8%
- Chinese: 1.5%
- Indian: 2.2%
- Pakistani: 0.8%
- Other Asian: 2.4%

Black: 17.6%

- African: 9.4%
- Caribbean: 6.2%
- Other Black: 2.0%

Mixed: 7.0%

- White and Asian: 1.5%
- White and Black African: 1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

White: 57.0% in total

- English/Welsh/Scottish/Norther Irish/British: 31.9%
- Irish: 2.2%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

During the first 8 months of the existing contract with Kingdom the number and percentage of FPNs issued against the ethnicity of individuals is set out in the table below:

Ethnicity	Number of FPNs Issued	Percentage of FPNs Issued
Not known	2927	32.24%
IC1 - White - North European	3750	41.30%
IC2 - White - South European	1181	13.01%
IC3 - Black	178	1.96%
IC4 - Asian (India, Pakistan, Bangladesh, Nepal)	505	5.56%
IC5 - Chinese, Japanese or other South East Asian	231	2.54%
IC6 - Arabic or North African	71	0.78%
IC9 - Unknown	236	2.60%

This data is monitored and corresponds closely to the borough profile. This data also includes FPNs issued to individuals committing offences within Haringey who may not reside in the borough.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

Operation Control Centre will be responsible for spot checking 20% BWC footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct.

Potential Impacts

We believe the decision will have a positive impact on people with this protected characteristic. Fly tipping data indicates that illegal dumping is often concentrated in areas with lower median incomes, higher percentages of non-English speakers, and communities of diversity, a pattern linked to historical discriminatory policies like redlining. These deprived and excluded communities are disproportionately exposed to environmental risks and may also be more vulnerable to their health effects.

4g. Religion or belief

Data

Borough Profile ¹²

- Christian: 39%
- Buddhist: 0.9%
- Hindu: 1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%
- Religion not stated: 8.0%
- Sikh: 0.3%

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We do not currently hold information about religion in relation to FPN's issued. However, within the extended contract, we will include (where given) provision of data on number of representations and the acceptance rate in relation to pregnancy and

¹² Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

maternity to analyse whether the service is disproportionately affecting people with this protected characteristic.

Potential Impacts

We believe the impact will be neutral on people with this protected characteristics.

4h. Sex

Data

Borough profile ¹³

- Females: (51.8%)
- Males: (48.2%)

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

During the first 8 months of the existing contract with Kingdom the number and percentage of FPNs issued against male and female individuals is set out in the table below.

Gender	Number of FPNs Issued	Percentage of FPNs Issued
Female	3515	38.72%
Male	5564	61.28%

Detail the findings of the data.

¹³ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

FPN's are issued on an evidence basis only. There is no accurate statistical information to benchmark the above against as it is not a requirement to provide this information as part of issuing an FPN.

Potential Impacts

We anticipate a neutral impact of enforcement action on this protected characteristic.

4i. Sexual Orientation

Data

Borough profile ¹⁴

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

The proposal is to extend the contract on the same terms as the existing contract. This approach will therefore be continued.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We do not currently hold information about sexual orientation in relation to FPN's issued. However, within the extended contract, we will include (where given) provision

¹⁴ Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

of data on number of representations and the acceptance rate in relation to sexual orientation to analyse whether the service is disproportionately affecting people with this protected characteristic.

Detail the findings of the data.

- c) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- d) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

All officers undertake mandatory 4 day CPC accredited training. This comprehensive training includes safeguarding/vulnerability modules to ensure enforcement action is not taken against vulnerable people. The representation process also exists if vulnerable individuals are not known of at the time of issuing. In addition, we propose to work with Kingdom to allow all staff to complete the Council's EDI training.

Operation Control Centre will be responsible for spot checking 20% BWC footage weekly to ensure compliance with the Equality Act 2010 which then will review any further training needs or staff inventions/HR escalation processes for misconduct.

Potential Impacts

We believe the impact will be neutral on people with this protected characteristic.

4j. Socioeconomic Status

Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹⁵
- 19.6% of residents were claiming Universal Credit as of March 2023¹⁶
- 29.3% of jobs in Haringey are paid below the London Living Wage¹⁷

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁸
- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁹

¹⁵ ONS – [ONS Claimant Count](#)

¹⁶ DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](#)

¹⁷ ONS – [Annual Survey of Hours and Earnings \(ASHE\) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics](#)

¹⁸ DfE – [GCSE attainment and progress 8 scores](#)

¹⁹ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

- 5.0% were qualified to level one only²⁰

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.²¹

Target Population Profile

There is no specific target population for environmental enforcement services or the existing enforcement services contract with Kingdom. Enforcement action takes place across the borough and FPNs or other enforcement action is taken against any individual found in violation of the respective legislations enforced through this contract.

Through the current contract, enforcement activity is delivered borough wide, across all wards. Officer deployment is informed by data including street cleansing scores, complaints received, reports received, the sharing of intelligence by residents through council reporting channels, and joint working with Veolia to address known hotspots. This ensures that resources are focused where community impact is greatest.

As such, environmental enforcement services are not targeted at individuals based on this protected characteristic.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

During the first 8 months of the existing contract with Kingdom the number and percentage of FPNs issued to individuals in each of the borough's wards is set out in the table below:

Ward	Number of FPNs Issued	Percentage of FPNs Issued
Alexandra Park	911	10.03%
Bounds Green	89	0.98%
Bruce Castle	220	2.42%
Crouch End	1	0.01%
Fortis Green	1	0.01%
Harringay	1016	11.19%
Hermitage and Gardens	3	0.03%

²⁰ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²¹ IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

Highgate	117	1.29%
Hornsey	51	0.56%
Muswell Hill	5	0.06%
Noel Park	283	3.12%
Northumberland Park	171	1.88%
Seven Sisters	501	5.52%
South Tottenham	446	4.91%
St Anns	123	1.35%
Stroud Green	16	0.18%
Tottenham Central	257	2.83%
Tottenham Hale	2707	29.82%
West Green	1263	13.91%
White Hart Lane	219	2.41%
Woodside	679	7.48%
Total:	9079	

Detail the findings of the data.

- Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This data is monitored to ensure that all wards are covered, that an intelligence led approach for deployment is followed and action within wards with the lowest IMD scores is not disproportionate. This data also includes FPNs issued to individuals committing offences within Haringey who may not reside in the borough, particularly prevalent in wards with multiple transport hubs, shopping areas and attractions.

Potential Impacts

We do not anticipate any negative impacts on people with this protected characteristic. Where an individual issued with an FPN cites financial hardship, an extended payment timeframe can be granted with payments spread across a 6 month period. The scheme is discretionary and generally based on the following principles:

- The impact that the payment plan may have on the claimant and other council services, especially homelessness, social care, household support and health

- The financial circumstances (income and expenditure, savings, capital, and indebtedness) of the claimant, their partner and anyone else living in their home
- Any special needs or health and social problems that the claimant and/or their household have, and what impact these have on their housing, work, and financial situation
- The length of time for which a payment plan is being sought

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

Enforcement action is taken against individuals and businesses based on illegal actions being witnessed by enforcement officers or evidence is identified through investigative work proving beyond reasonable doubt that an offence has been committed. Services are not targeted at individuals based on protected characteristic.

All Kingdom environmental enforcement officers undertake mandatory 4 day CPD accredited training. This training includes care, equality, diversity, safeguarding, and vulnerability modules as part of the qualification.

Officers are trained to understand lawful and unlawful behaviours, recognise protected characteristics, be able to identify vulnerabilities and communicate effectively with the public.

All action carried out by Kingdom officers are recorded and saved into the LAS Access system. This includes offence type, location, age and ethnicity of the individual. This is fully accessible to the councils recycling, waste and enforcement team. Data is monitored, quality checks are undertaken and performance reports produced and discussed at monthly contract liaison meetings.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
- Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

N/A

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

N/A

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

Enforcement action is taken against individuals and businesses based on illegal actions being witnessed by enforcement officers or evidence is identified through investigative work proving beyond reasonable doubt that an offence has been committed. Services are not targeted at individuals based on protected characteristic as it is evidence driven.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them

Y

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below

N

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.

N

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action: Enforcement action is taken against individuals and businesses based on illegal actions being witnessed by enforcement officers or evidence is identified through investigative work proving beyond reasonable doubt that an offence has been committed. Services are not targeted at individuals based on protected characteristic.

Data on protected characteristics is not mandatory for issuing an FPN and we currently have limited information accordingly. However, we will look to request more information from our service provider via the extended contract when issuing an FPN to better understand how our services affect people with protected characteristics.

Lead officer: Beth Waltzer

Timescale: March 2026

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

N/W

Please provide a complete and honest justification on why it is not possible to mitigate the:

N/A

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Data will be analysed monthly as part of the contract management framework in place. In addition, the Council has access to the contractor's IT database so can examine data at any given time.

Date of EQIA monitoring review:

23.12.25

8. Authorisation

EQIA approved by (Director for Environment)



Date

5 January 2026

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

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By virtue of paragraph(s) 3, 5 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is exempt

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