

**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 6<sup>th</sup> 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 5<sup>th</sup> 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 6<sup>th</sup> 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