

Report for: Cabinet – 15 September 2026

Item number: 12

Title: Approval to procure Enhanced Environmental Enforcement contract

Report authorised by: Barry Francis, Corporate Director of Environment and Resident Experience

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

Ward(s) affected: All

Report for Key / Non Key Decision: Key

1. Describe the issue under consideration

- 1.a This report seeks approval to undertake a procurement exercise for the provision of environmental enforcement services across the borough.

2. Cabinet Member Introduction

- 2.a Clean streets, parks, housing estates and open spaces make people feel their local areas are valued and cared for, and that they are too.
- 2.b For too long, this has not been the case in Haringey. Littering and fly-tipping are among the biggest concerns for our residents and businesses. That is no surprise when we received around 46 reports of fly-tipping every day in 2024/25.
- 2.c Residents are rightly angry: dumped waste blights the borough, stops people enjoying where they live, and makes streets feel less safe.
- 2.d This is a waste crisis, and tackling it is a top priority of the Corporate Delivery Plan. Our forthcoming campaign, Love Haringey, is designed to build pride through education and action, an opportunity for the council, residents and businesses to work together to improve the cleanliness of our streets and parks.
- 2.e As an administration, our approach rests on community-led action that educates and encourages people to build pride in and care for our shared environment.
- 2.f At the same time, we recognise that a level of enforcement is needed to improve the cleanliness of our borough, and this is why I recommend that Cabinet approves the procurement of a new waste enforcement contract. We know there is broad support for this across the borough. In 2023, 96% of residents backed fines for fly-tipping, and 94% supported penalties for dog fouling and littering.
- 2.g However, we also know that without a strong ethical framework, enforcement can be unnecessarily punitive. We will therefore strive for a contract that focuses on serious and wilful offences rather than minor transgressions and honest mistakes. Our priority will be the real culprits of environmental crimes: the people who knowingly dump and

make their mess someone else's problem, leaving the council and residents to foot the bill.

- 2.h Furthermore, we recognise that contracts paid through the fines they issue can create the wrong incentives. Procurement will be designed to guard against this, in line with both statutory guidance and our own principles: enforcement must never be a means of raising revenue.
- 2.i Fairness also means making sure people know the rules. Many people don't know that gifting unwanted items outside their homes, feeding pigeons, or putting cigarette butts in bin bags on the street can all be considered offences. We will provide more public information, such as signs, so people know the rules and the penalties, and fewer honest mistakes end in a fine. At a minimum any new contract will keep the representation process, allowing fines to be challenged. And we will work to make this process as clear and easy to follow as possible.
- 2.j We all have a duty to take care of where we live, and we all have a right to a clean borough we can take pride in. This contract is one small piece of that puzzle.

3. Recommendations

3.a It is recommended that Cabinet:

- 3.a.1 approves the commencement of a procurement exercise for an enhanced environmental enforcement contract for offences listed in Appendix 1, in accordance with CSO 2.01.b),
- 3.a.2 requests the approval of Council to tender for enforcement of those offences listed in Appendix 1 as requiring Council approval.
- 3.a.3 notes that the outcome of the procurement will be cost-neutral to the council, and the council will be retaining a proportion of the value of collected FPNs.

4. Reasons for decision

- 4.a The contract to deliver environmental enforcement with Kingdom Services Group Limited, as extended in February 2026, will expire in 2027. If the council wish to continue undertaking environmental enforcement across the borough, a new contract will need to be implemented.
- 4.b Whilst this contract is cost-neutral to the council, it is anticipated that the value of the contract will exceed £500,000. In accordance with the Contract Standing Orders 2.01.b), Cabinet must approve the commencement of a procurement exercise for contracts valued at £500,000 or more.
- 4.c Under the outcome of 'A cleaner, low waste Haringey' of the 'Responding to the climate emergency' theme of the Corporate Delivery Plan 2024 – 2026 the Council had previously set an activity for delivering “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.d The new Corporate Delivery Plan currently being developed by the new administration also has a commitment to tackling fly tipping in the Borough which is one of the top 10 priorities for the council.
- 4.e Engagement with residents in 2026, with responses from approximately 9,000 residents, businesses and community groups revealed that 96% strongly agreed or agreed with fining those responsible for fly-tipping and 95% strongly agreed or agreed with fining people for dog fouling or littering.
- 4.f Whilst the council has an internal waste enforcement team, this team is limited in capacity and focuses on more preventative measures, complex cases and undertaking work to prosecute offenders. Having capacity of an outsourced service allows our officers to focus on this work, whilst giving flexibility to respond to hot spot areas across the borough with additional staff provided through the contract.
- 4.g There is an MTFS income target associated with environmental enforcement of £50,000 for 2027/28, without this contract this target cannot be achieved.

5. Alternative options considered

- 5.a The council could do nothing, allowing the contract with Kingdom to expire without a replacement. This would mean the council does not have sufficient resources to take enforcement action against those who purposefully commit offences such as littering and dumping waste.
 - 5.a.1 Without education and a deterrent, there could be an increase in littering and dumping waste across the borough, having an impact on street cleansing services, creating financial costs in terms of both collection and disposal.
 - 5.a.2 Therefore, this option is not recommended.
- 5.b The council could insource the service, undertaking all environmental enforcement action itself. This would mean the council would need either need to commit to additional resources to deliver the services, or continue with the current team, meaning the council does not have sufficient resource to take enforcement action against those who purposefully commit offence such as littering and dumping waste.
 - 5.b.1 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.
 - 5.b.2 Financial pressures facing the council also mean this option is unaffordable with an estimated annual pressure of circa £1.4m.
 - 5.b.3 Without the support an out-sourced service can provide (such as specialist software and back-office support), the council's ability to tackle and reduce environmental crimes will be significantly reduced.
 - 5.b.4 Therefore, this option is not recommended.

6. Background information

- 6.a In a 2023 survey undertaken as part of the Waste Services Review, residents, visitors and businesses showed an overwhelming support for taking a tougher stance on those who do not look after our borough.
- 6.b 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.c As a result, the council committed in the Corporate Delivery Plan 2024 – 2026 to undertake enforcement action across the borough and as the future Corporate Delivery Plan currently being developed by the new administration has a commitment to tackling fly tipping in the Borough as one of the top 10 priorities for the council, it is recommended the hybrid approach is continued.
- 6.d The council is empowered to undertake enforcement action against a range of offences committed, which are listed under the Environmental Protection Act 1990, Anti-Social Behaviour, Crime and Policing Act 2014, Anti-social Behaviour Act 2003 and London Local Authorities Act 1990.
- 6.e The maximum amount of a fixed penalty is set by the relevant legislation, and in recent years some values have been increased significantly by the Secretary of State. Most recently increased by 400% for fly-tipping (from £1,000 to £4,000) and 50% for littering (from £500 to £750) in July 2026.
- 6.a With the new administration coming into power in May 2026, tackling litter and fly-tipping is a CDP priority. In this case, the focus is on building a public campaign (Love Haringey) to create a sense pride in the borough, and work with communities to keep it clean. In addition to exploration of efforts to make it easier (e.g. more public bins) this will include an increase in educational information about what does and doesn't constitute fly-tipping, as well as warnings about potential fines. Consequently, at this point, the council does not intend to raise the fines above the current levels.

Current Service

- 6.b Kingdom was awarded a one-year contract in February 2025 to undertake environmental enforcement activity across the borough, which was subsequently extended for an additional one year. This was the total period allowed for in the existing contract.
- 6.c During the 2025/26 financial year Kingdom issued just over 10,000 FPNs, of which those paid FPNs amounted to a total value of £980,000.
- 6.d Of the FPNs issued:
 - 6.d.1 66% related to littering offences observed by enforcement officers,
 - 6.d.2 20% related to businesses unable to provide correct Duty of Care documents when visited by enforcement officers,
 - 6.d.3 7% related to households not managing waste correctly either observed or investigated by enforcement officers,
 - 6.d.4 6% related to fly-tipping incidents investigated by enforcement officers, and

- 6.d.5 1% related to other offences such as failure to comply with Public Space Protection Order (PSPO) or Community Protection Notice (CPN) observed by enforcement officers.
- 6.e Moving forwards into the new contract, we intend for the contractor to focus more on tackling fly tipping offences using evidence gathered from our front-line fly tipping teams. From April 2027, we will have improved digital systems (in cab technology and smartphones for crews which is currently not available) as part of the new waste contract will enable crews to do this.
- 6.f The current contract has enabled renewed implementation of the Single Justice Procedure (SJP). The SJP is a fast-track legal process used to prosecute minor offences, particularly by councils for environmental offences. There have been 274 successful SJP prosecutions for littering crime from October 2025 to June 2026 is .
- 6.g It is difficult to exactly quantify the improved outcomes from the inhouse service benefitting from this contract due to changes in the team structure which means comparison is limited. In addition, the current IT system (M3PP) is limited in its ability to analyse data and provide intelligence on the same timescales as work has been undertaken since contract commencement to improve processes within the team. Please note the system is being replaced in November 26 due to its limited scope and age.
- 6.h However, we do know that the inhouse service caseload (includes highways and illegal street trading enforcement) has continued to increase year on year over the last three years, yet in the same time period, the response time has improved (36% improvement in officers responding to enquiries within 10 working days). This is despite the reduction of two officers within the team due to vacancies and can in part be attributed to external officer support via this contract.
- 6.i The anticipated case workload for 2026/27 for the inhouse team is set to be the highest since post Covid times (see below) and without external support, the in-house service will face challenges in managing the workload:

Year	Number of Cases
2024 - 25	4555
2025 - 26	4879
2026 - 27	Estimated 6k

- 6.j The average number of prosecutions per officer within the inhouse team has seen a 9% increase since contract commencement.
- 6.k In terms of outcomes on litter and fly tipping levels, we have seen an improvement in the litter levels measured from Tranche 4 2024/25 to Tranche 4 2025/26 of 2%. Whilst fly tipping incidents have increased since contract commencement, it should be noted that this is due to more officer presence in the borough and subsequently higher levels of reporting. Despite this, the average time to clear all fly tips remains consistent at 5.4 hours.

Future Service

- 6.l A competitive procurement process will be undertaken to select a service provider who can deliver enhanced environmental enforcement across the borough and has suitable and relevant experience.
- 6.m The services will continue to be delivered as a concession, in which the financial risk sits with the service provider. The council will retain a proportion of the value of paid FPNs, whilst the service provider will take on all costs to deliver the services through their share of the paid FPNs.
- 6.n The value of the split of paid FPNs will be determined as part of the bidder's submission. Bidders will be evaluated based on their proposed split. The bidder providing the highest proportion to the council will get the most points, and other bidders will get a score based on the difference. Bidders will also be required to demonstrate that they are able to sufficiently deliver the services with their share of paid FPNs.
- 6.o We recognise some of the issues associated with enforcement based on FPN fines and will be working to ensure we have as ethical an approach as is viable in the forthcoming procurement. This will be enabled through a contract that does not have bonus related performance payments in relation to revenue targets, and a new and improved Specification and Performance framework which will be developed to ensure that the services are delivered to our standards and that we can hold the service provider to account. This will include provisions such as
 - 6.o.1 Proposals for reducing litter and fly tipping.
 - 6.o.2 Clear requirements for quality control and monitoring (including the representation process) and
 - 6.o.3 clear requirements for monthly data reporting.
- 6.p We are working alongside colleagues from across the directorate and cross directorate to ensure the service can provide support and meet enforcement needs of housing, parks and highways (including dockless bikes)

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

- 7.a This decision relates to the 'Responding to the climate emergency' theme of the Corporate Delivery Plan 2024 - 2026, specifically supporting the outcome areas of 'A cleaner, low waste Haringey'.
- 7.b 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.c The new Corporate Delivery Plan under development also has a commitment to tackling fly tipping in the Borough and this decision supports that priority.
- 7.d There is an MTFs target associated with environmental enforcement of £50,000 for 2027/28.

8. Carbon and Climate Change

- 8.a This decision has no direct impact on carbon emissions or reducing the impact of climate change, however, the services are beneficial to supporting the council's response to the climate emergency.
- 8.b Undertaking enforcement against offences will reduce the amount of dropped litter and dumped waste across the borough, which will have a positive impact on the local environmental.
- 8.c The team delivering the services will largely travel around the borough using public transport and by foot.

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

Finance

- 9.a This report seeks Cabinet approval to commence a procurement exercise for an enhanced environmental enforcement contract, as the current contract is due to expire in February 2027.
- 9.b The Council's Medium Term Financial Strategy (MTFS) includes an income target of £50,000 for 2027/28 associated with environmental enforcement activity. Achievement of this target is dependent on the continuation of the environmental enforcement contract.
- 9.c The proposed contract is expected to be cost-neutral to the Council and is anticipated to have a total value exceeding £500,000 over its term.
- 9.d During 2025/26, the environmental enforcement contract generated approximately £987,335 in income against a budget of £895,000 through the issuing of Fixed Penalty Notices (FPNs). The value of FPNs is set by the relevant legislation and, despite a recent significant increase in the maximum penalty levels by the Secretary of State, the Council does not intend to increase fines above the current levels.
- 9.e The proposed procurement aligns with the Council's Corporate Delivery Plan 2024-2026 and supports the ambition to achieve a cleaner, lower-waste Haringey.

Procurement

- 9.f The proposed procurement relates to an environmental enforcement concession-style arrangement where the contractor will be remunerated through a proportion of income generated from paid Fixed Penalty Notices (FPNs) and is intended to be cost neutral to the Council with an anticipated value of some £500k. The provision is at threshold for the application of procurement legislation
- 9.g Strategic Procurement has supported officers in considering the route to market and agrees that an Open Procedure represents an appropriate and proportionate approach to securing competition with access to the widest range of suitably experienced providers operating within this specialist market.

- 9.h As required by CSO 2.01b Cabinet must approve the commencement of a procurement exercise where the value of the contract is anticipated to be 500k or more

Director of Legal & Governance

- 9.i The Director of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report.
- 9.j The proposed value of the contract whilst cost neutral to the Council is above the threshold where the procurement rules for concession contracts as set out in the Procurement Act 2023 will apply.
- 9.k In accordance with CSO 2.01 b) the Cabinet is required to approve the procurement of contracts valued at £500,000 or more.
- 9.l The Director of Legal and Governance confirms that there are no legal reasons preventing the Cabinet from approving the recommendations in this report.

Equality

- 9.m Enforcement action is taken against those individuals and businesses who have committed offences under the relevant legislation. Enforcement officers will issue FPNs only where they have witnessed an offence or have identified an offender through their investigations having no reasonable doubt that an offence has been committed.
- 9.n FPNs issued to offenders by the current service provider closely align to the boroughs age, gender and ethnicity characteristics. This shows strongly that FPNs are issued for offences and without bias or prejudice. This provides reassurance that the officers recruited, training delivered, service provider management and council contract management are robust and will be continued for the remainder of this and into future contracts.
- 9.o An Equalities Impact Assessment (EqIA) has been undertaken (see Appendix 2), and the outcome has been fed into the development on the Service Specification to ensure that those with protected characteristics are not unfairly treated.
- 9.p Within the Service Specification the council will set the following requirements:
- 9.p.1 suitable training to be provided to all enforcement officers before they start patrolling the borough, including modules with specific content on safeguarding and protecting vulnerable people, and completion of the council's own Diversity, Equity and Inclusion training course;
 - 9.p.2 no enforcement action to be taken against those who are under 18, or adults who are vulnerable;
 - 9.p.3 regular reviews of body worn camera footage to ensure all enforcement officers are complying with the Equality Act 2010;
 - 9.p.4 representation process for those who may be vulnerable, but this was not clear at the time of issuing the FPN; and
 - 9.p.5 no targeting of any individual.

10.Use of Appendices

10.a Appendix 1 – List of Legislation and Offences

10.b Appendix 2 EqlA

11.Background papers