

Resources & Public Realm Scrutiny Committee

6 September 2016

Report from Strategic Director of Regeneration & Environment

For Information

Progress Report on Recommendations of Scrutiny Fly-Tipping Task Group

1.0 Summary

- 1.1 The Fly-Tipping Task Group was formed in 2015 by the Scrutiny Committee in response to communicated concerns from Brent residents regarding increased fly-tipping levels in the borough. The purpose of the task group was to analyse and consider the borough's knowledge, behaviour and understanding of fly-tipping, to review local fly-tipping policies and processes, and to put forward recommendations to bring about improvements to the service.
- 1.2 The review was reported to Scrutiny Committee on 5th November 2015, and made 26 specific recommendations, principally concerned with reducing the levels of fly-tipping in Brent and ensuring clean and safe environments for Brent residents; and as a result, a reduction in clean-up and enforcement costs.
- 1.3 This report provides an update on progress against these recommendations since that time.

2.0 Recommendations

2.1 That Members of the Resources & Public Realm Scrutiny Committee note the contents of this progress report.

3.0 Detail

- 3.1 As part of the 2015/16 Committee Work Programme, Members of the Scrutiny Committee requested a time-limited task group be formed to undertake a focused piece of work on potential actions to change behaviours through education and reduce fly tipping in Brent.
- 3.2 The task group looked at the scale of the problem in the borough, how Brent compares with other authorities, why people fly-tip and what can be done about it. The review focused on a top-to-bottom analysis of the Council's internal and external processes for dealing with fly-tipping; involving a range of stakeholders, local resident groups, officers and partners; along with a range of visits and meetings, consultation with other local authorities and government departments, and an analysis of data and research relating to fly-tipping.
- 3.3 The report was considered by the Scrutiny Committee at its meeting on 5th November, at which the committee resolved:

- (i) that the recommendations of the scrutiny task group on fly tipping be approved and the development of an action plan across the council and partner organisations to take them forward be supported, and;
- (ii) that a progress report against the recommendations be submitted to the Scrutiny Committee in 6 months' time.

3.4 Fly-tipping Task Group Recommendations

3.5 The 26 recommendations of the group were divided under five overarching subjects of knowledge, education, enforcement, impact and publicity, as follows.

Knowledge

- 1. The task group recommends that the term "Fly-tipping" should be changed to "Illegal Rubbish Dumping" (IRD) in communications with residents. Residents rarely refer to dumped rubbish as fly-tipping and there is apparently confusion among some residents about what "fly-tipping" actually means. This is not a good basis on which to communicate with residents about the issue, therefore the task group recommends changing the language we use.
- 2. A named officer/s within the Waste Management service should be responsible for continuous monitoring of new methods to tackle IRD, keeping the council abreast of the latest developments and leading improvement practices; not just from other London boroughs and the UK, but from Europe and the rest of the world. The task group supports the behavioural studies that the council is currently participating in as part of the West London Alliance (WLA) and recommends that it should continue to build on this area of work.
- 3. Brent Waste Management service should review its internal benchmarking, looking internally at how we monitor our own performance and should report performance quarterly in public. It is recommended that this is communicated to residents and other councillors via the council's website and Brent Magazine.
- 4. Brent Waste Management should liaise with neighbouring London boroughs to develop a benchmarking network. The West London Alliance (WLA) would be a good place to start as there are links already established. There should also be additional cross-border networking, feeding into intelligence with the aim of bringing forward more prosecutions for trade waste dumping.

Education

- 5. Constitutionally empower "Community Guardians" by appointing, through an agreed selection process, figureheads like the chair of Keep Wembley Tidy. Councillors can support this by identifying suitable candidates. These guardians are to be given a profile on the council's web page, support and resources from the council and Veolia; to tackle illegal rubbish dumping in their appointed locations.
- 5.1 It was identified in the task group's research that residents often identify with different place names than the wards in which they live. The task group is recommending that the community guardians' structure in Brent is mapped in the following village localities and guardians are allocated to these areas:

Wembley	Dudden Hill	Kensal rise
Kenton	Neasden	Stonebridge
Queens Park	Sudbury	Kilburn
Harlesden	Alperton	Willesden

- This approach should be integrated with the voluntary Community Action Groups.
- 5.2 Guidance and a code of practice for the community guardians and village areas should be drawn up and agreed by officers and residents. This should include action days and identifying and evidencing illegal rubbish dumping hot spots. Village websites should also be linked to the council's waste management web pages.
- 5.3 It will be a priority of the community guardians, councillors, officers and Veolia to devise and produce a 'Brent Against Rubbish Dumping Charter', which Businesses, HMO Landlords and Estate/Letting Agents will be encouraged to sign up to and display publicly.
- 5.4 It will be a priority of the community guardians, councillors, officers and Veolia to engage with places of worship, youth clubs and sports clubs to engage and promote the Brent Against Rubbish Dumping Charter.
- 6. The process of reporting IRD should be clear and straightforward, so that both residents and officers know what is to be expected and how and when there will be communication between parties. This should be documented on the council's IRD web page.
- 7. Brent waste management and Veolia should liaise with Brent education and Brent schools partnership to ensure that there is a strategic anti-Illegal rubbish dumping programme going into schools, aimed at both primary school and secondary school level. The programme should be continuous and target 100% of schools on an annual basis, encouraging schools to sign up to the Brent Against Rubbish Dumping Charter. Progress should be reported on the council waste management web page on a quarterly basis.
- 8. Business liaison should be part of an officer's role; this should include an evaluation of any non-monetary incentives that can be offered. Brent should encourage businesses to sponsor a bin or bins, as a result of which businesses will become certified and will be allowed to display a Brent Council sign stating that they are opposed to IRD.
- 9. Additional resources should be invested in to the Special Collection Service, so that items are collected sooner and the number of bulky items illegally dumped is reduced. Other alternative options for waste disposal and recycling should be promoted with direct links on the council's web page and offered on the phone when residents call to request Special Collection Services such as Freecycle and Freegle.

Enforcement

- 10. The task group recommends the formation of a strategic approach between Waste Management Enforcement services and the CCTV service to ensure more use of the current CCTV provision to monitor IRD hotspots. It is understood that this will require collecting evidence and providing a supported case for each camera.
- 11. Waste management services, specifically trade and Environmental health services, must work together more strategically; sharing information and working on joint visits where there is clear intelligence that there are crosscutting priorities.
- 12. A strategic approach between Housing Enforcement and Waste Management Enforcement services via Veolia should be formed to ensure that HMO landlords are educated as to their responsibilities regarding waste disposal for themselves and their tenants.
- 13. Enlist the support of night workers such as black cab drivers and night bus drivers to use the cleaner Brent app and report any perpetrators of IRD. This could be achieved by contacting taxi firms and Transport for London to explain our case and by asking them to cascade our request down to workers. The council would in turn be able to release positive press stories about these organisations.
- 14. We will look to pre-capitalise on new fly-tipping legislation, to be brought forward next year, by following a similar model to Ealing Council, as follows: *'The council has*

- teamed up with Kingdom Security to provide dedicated teams of uniformed officers in the borough. Kingdom Security will work with the council's environmental enforcement officers, providing a high-profile deterrent and issuing £80 fines. Operating initially on a one-year trial basis, Kingdom Security is working at no cost to the council. Instead they will take a share of the fines they issue'.
- 15. The Council should work with other local authorities and the National Fly-tipping Prevention Group to lobby the Government for more effective enforcement powers.
- 16. The selective Landlord licensing scheme should be reviewed annually and reported on publicly with statistics on how effective the scheme has been, where it has been effective, areas where the council can strengthen its enforcement and any lessons learnt.
- 17. The landlord licensing guidance should have more detail in the wording regarding waste & refuse, so that it is harder for landlords to avoid discharging their responsibilities effectively.
- 18. Leaflets about Brent's waste disposal policies should be inserted into the guidance so that landlords can give them to tenants. The leaflet/insert scheme should also be rolled out to estate & letting agents.

Impact

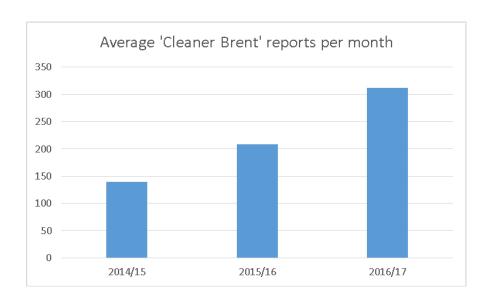
- 19. Further investigation is required into the impact of the garden waste collection charges. Cabinet should review its effectiveness from a cost and efficiency perspective, annually until 2018.
- 20. Owing to the lack of quantitative data to evidence the effects of the garden waste charge at this stage, officers should review and report the effects of its first year in operation. Officers should devise logical metrics against which it can compare its performance annually until 2018.
- 21. The number of Brent residents that have signed up, and continue to sign up, to the Garden waste collection service should be more widely publicised. The Brent website and Brent magazine should be the media for this.

Publicity

- 22. Future publicity about IRD should be continuous, mainly word-of-mouth and not confined to one-off PR campaigns. The last major PR campaign in 2013 involved large, difficult-to read signs under which rubbish was dumped. It also saw photo opportunities to show the lead member was determined to deal with the issue, but officers confirm that it had little tangible impact on levels of IRD.
- 23. Officers, councillors and community guardians need to visit relevant local meeting places whether they be religious meeting places, youth clubs or sports clubs to pass on the council's messages about IRD and how communities can work with Brent to tackle it.
- 24. Leafleting campaigns led by the council and voluntary groups should be in multiple languages, appropriate to the socio-dynamics of the local area.
- 25. Any future communications should also be easy-to-read with no conflicting messages. This should be backed up with targeted local advertising. Brent London Underground and National rail stations are prime locations for such advertising.
- 26. The Cleaner Brent App requires further publicity, and probably a re-launch, as not enough people are aware it exists. There should be further publicity on the web and in the Brent magazine.
- 3.6 The table at Appendix 1 sets out a summary of the progress made to date against each of these recommendations.

3.7 Impact

- 3.8 As well as reviewing the activity carried out over the past 12 months in response to the Task Group's recommendations, it is also important to review the impact of the work carried out over that time.
- 3.9 The Environmental Improvement Team has a range of Performance Indicators it uses to assess and monitor the impact of its activities, and the work of Veolia, across the borough. Below is a summary of relevant performance data across 2014/15 and 2015/16.
- 3.10 The graph below shows the average number of reports made per week via the Cleaner Brent App since its introduction in 2014. This shows that use of the app has more than doubled since its introduction, and has grown by over 50% (from 209 to 312 per week) in the past year.



3.11 The percentage of streets falling below a 'pass rate' upon inspection for litter is another helpful measure when assessing the impact of the work undertaken over the past 12 months to address Illegal Rubbish Dumping. Below are the statistics for the past 5 Quarters- up to July 2016:



3.12 An independent organisation is commissioned to carry out an annual customer satisfaction survey, with specific questions on different aspects of the Public Realm Contract. The outcome of the street cleansing survey in 2015/16 compared with 2014/15 is shown in the graph below.



3.13 Residents were asked to advise whether they are "very dissatisfied, dissatisfied, neither satisfied or dissatisfied, satisfied or very satisfied" with the overall Street Cleaning Services. As can be seen above, with 71% responding that they were either satisfied or very satisfied in the 2016 survey, compared with 69% in 2015, residents were marginally more satisfied with street cleaning in 2015/16 than they were in 2014/15.

4.0 Financial Implications

- 4.1 None
- 5.0 Legal Implications
- 5.1 None
- 6.0 Diversity Implications
- 6.1 None
- 7.0 Staffing/Accommodation Implications (if appropriate)
- 7.1 None

Contact Officers

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Appendix 1

Rec	ommendation	Action to date	Status
KNO	OWLEDGE		
1	The task group recommends that the term "Fly-tipping" should be changed to "Illegal Rubbish Dumping" (IRD) in communications with residents. Residents rarely refer to dumped rubbish as fly-tipping and there is apparently confusion among some residents about what "fly-tipping" actually means.	The term 'Illegal Rubbish Dumping' is now being used alongside the term 'fly tipping' in all communications and correspondence from the Council. A new service leaflet has recently been designed which incorporates IRD terminology plus the Love Where You Live branding. The Environmental Improvement Team are in the process of trialling the effectiveness of this leaflet in a pilot area of 10 particular hotspots. In addition the webpages have been updated to ensure that all fly-	G
		tipping terminology has been replaced by the term IRD. This page is under constant review to seek improvements where required. Also, in partnership with the communications team, a video on IRD has been developed to offer guidance to residents on the process for reporting IRD using the Cleaner Brent App. This video will be released on the Council's website and through the "Your Brent" enewsletter later this year.	
2	A named officer/s within the Public Realm service should be responsible for continuous monitoring of new methods to tackle IRD, keeping the council abreast of the latest developments and leading improvement practices; not just from other London boroughs and the UK, but from Europe and the rest of the world. The task group supports the	The Envirocrime Manager and Head of Environmental Improvement fulfil this role. The service already subscribes to (and benefits from membership of) Keep Britain Tidy. The WLA Behaviour change work reported in March. The findings from this work were mixed- but where positive outcomes were achieved, they will be used to inform future interventions. The main outcomes from the Brent initiatives undertaken were that posters in bin areas were shown to have some effect in getting residents to change their behaviour by using all available bins and	G

	behavioural studies that the council is currently participating in as part of the West London Alliance (WLA) and we recommend that it should continue to build on this area of work.	not dumping waste on the floor. In addition the murals which were painted on two bin sheds had the effect of not only bringing the community closer together but also greatly reducing the amount of waste dumped at those sites. All future communications with residents will consider the use of behaviour change initiatives and methodologies and demand management processes.	
3	Brent Public Realm service should review its internal benchmarking, looking internally at how we monitor our own performance and should report performance quarterly in public. This reporting should be communicated to residents and other councillors and it is recommended that the council's website and Brent Magazine are the media for this.	Key performance measures (such as street cleanliness, number of fly-tips reported, clear-up times, etc.) are already reported publicly on a quarterly basis. In addition, the Public Realm Contract has a suite of 'Key Outcome targets' which measure contract performance across all aspects of the service. These are reviewed and monitored by Officers on a monthly basis. Work is underway with the Business Intelligence Unit to produce 'heat maps' of problem hot spots; and to develop a 'performance dashboard' of headline indicators that can be shared on a routine basis with the Lead Member and- once finalised- Ward Members, residents, etc.	G
4	Brent Public Realm Service should liaise with neighbouring London boroughs to develop a benchmarking network. The West London Alliance (WLA) would be a good place to start as there are links already established. There should also be additional cross-border networking, feeding into intelligence with the aim of bringing forward more prosecutions	London Environmental Directors' Network (LEDNET) has commissioned a series of pan-London workshops specifically focused on Rubbish Dumping. These workshops are intended to identify practical ways to reduce London's fly-tipping problem and the final output is likely to include a number of recommendations to be taken forward.	G

1	for trade waste dumping.		
EDI	JCATION		
5	Constitutionally empower "Community Champions" by appointing, through an agreed selection process, figure heads like the chair of Keep Wembley Tidy. Councillors can support this by identifying suitable candidates. These champions are to be given a profile on the council's web page, support and resources from the council and Veolia; to tackle illegal rubbish dumping in their appointed locations.	One outcome of the recent demand management project- and the Community Action group pilot was the identification of the issue that a heavily formalised process can deter residents from getting involved in partnerships and activities with the council. It is felt that the development and growth of the Love Where You Live Campaign, launched on the 14th February 2016, has however taken up this role successfully without the need to formalise any process. There are already over 800 formally constituted groups in Brent, and many Residents' Associations are already getting increasingly more involved with the council in showing how they Love Where They Live, by reporting instances of IRD, organising community clean up days and generally offering a support mechanism for others to have a voice about their local community. The council is supporting these residents groups by promoting their events and successes on social media channels such as Twitter and Facebook, and Veolia are fully supporting groups by providing bags and litter picks and collecting waste gathered on clean up days. This approach can be further supported by the Partnerships Team and their links with the voluntary and community sector, including the 'volunteering Brent' contract.	A
5.1	It was identified in the task group's research that residents often identify with different places names than the wards in which they live. The task group is recommending that the community champions' structure in	The Partnerships Team are looking at this issue on a corporate level as part of the Community Action Group pilot project, and are due to report their findings and recommendations later this year.	A

	Brent is mapped in village localities and champions are allocated to these areas. This approach should be integrated with the voluntary Community Action Groups.		
5.2	Guidance and a code of practice for the community champions and village areas should be drawn up and agreed by officers and residents. This should include action days and identifying and evidencing illegal rubbish dumping hot spots. Village websites should also be linked to the council's waste management web pages.	The Love Where You Live campaign has taken this action forward, and action days are being run and requested regularly by local residents groups all across the borough, without the need for a code of practice. The Council, with Veolia, have supported and facilitated the work of these groups, and will continue to do so. However, as explained in 5.0, there appears to be little appetite among the groups for further formalisation and/ or bureaucracy. Since April Veolia have been involved in and supported 11	G
		community clear up days arranged across Brent.	
5.3	It will be a priority of the community champions, councillors, officers and Veolia to devise and produce a 'Brent Against Rubbish Dumping Charter', which it will encourage Businesses, HMO Landlords and Estate/Letting Agents to sign up to and display publicly.	An all-Member session is intended to inform the content of this Charter. Officers will work with the Lead Member to inform the content and timing of this session,	R
5.4	It will be a priority of the community champions, councillors, officers and Veolia to engage with places of worship, youth clubs and sports clubs to engage and promote the Brent Against Rubbish Dumping Charter.	This activity cannot be undertaken without the development of the Charter mentioned above. However Veolia are engaging with the local community to give talks on effective waste management.	A
6	The process of reporting IRD should	The Council's IRD Webpage has been updated, and provides clear	G

	be clear and straightforward, so that both residents and officers know what is to be expected and how and when there will be communication between parties. This should be documented on the council's IRD web page.	and straightforward instructions on how to report an issue: https://www.brent.gov.uk/services-for-residents/transport-and-streets/keeping-the-streets-clear-and-clean/illegal-rubbish-dumping/ The graph in paragraph 3.7 of this report shows the increased usage of the Cleaner Brent since the launch of the Love Where You Live Campaign. This shows that residents are finding it easier to report incidents of IRD. We are using Twitter to advise residents of the availability of the app and residents are also taking to Twitter to advise others about using it.	
7	Brent Public Realm Service and Veolia should liaise with Brent education and Brent schools partnership to ensure that there is a strategic anti-Illegal Rubbish Dumping programme going into schools, aimed at both primary school and secondary school entry children. The programme should be continuous and target 100% of schools on an annual basis, encouraging schools to sign up to the Brent Against Rubbish Dumping Charter. Progress should be reported on the council waste management web page on a quarterly basis.	Veolia's Communication and Education team are already actively managing a schools engagement programme called Waste Transformers, which includes sections on littering. Going forward, this will reflect the key themes of the Love Where You Live campaign (the main emphasis of which is Illegal Rubbish Dumping). An anti-litter competition was run with primary schools earlier this year. Primary schools were invited to design a poster about littering. The winning poster is displayed in the main notice boards of the main parks in Brent. To date, 35% of Brent's primary schools have been engaged with this year, and every secondary school has been contacted by letter and email to advise them of the availability of our theatre performance on recycling.	G
8	Business liaison should be part of an officer's role; this should include an evaluation of any non-monetary	This approach is currently being explored in the work that the High Streets and Town Centres Team is leading on. A main priority for the High Streets team is to help enable business come together and	G

	incentives that can be offered. Brent should encourage businesses to sponsor a bin or bins, as a result of which businesses will become certified and will be allowed to display a Brent Council sign stating that they are opposed to IRD.	form a "one voice" business community for the local centre. There is a growing need for some of Brent's priority town centres to establish a "sense of place" and this can be achieved through "definitively characterised" wayfinding and linkage interventions. As part of this element of high street regeneration, the high streets team will be working with business groups to explore the possibility of (for example) sponsoring litterbins in the area.	
		Ealing Road Traders Association (ERTA) is one of the first recently formed business groups who are keen to explore such an opportunity as part of their short term action plan for the high road.	
		Cleanliness is one of the main challenges that ERTA are addressing in the area and they are currently leading on an intensive Clean Up awareness campaign, which will be followed by a council-led commissioned decluttering programme aimed at rationalise the street furniture in the area.	
9	Additional resources should be invested in to the Special Collection Service, so that items are collected sooner and the number of bulky items illegally dumped is reduced. Other alternative options for waste disposal and recycling should be promoted with direct links on the council's web page and offered on the phone when residents call to request Special Collection Services such as Freecycle and Freegle.	Additional resources have been deployed onto the Bulky Waste Service on a number of occasions to bring waiting times down, but this is not sustainable longer-term. Further options for the sustainable management of this service into the future are currently being actively developed, and are to be considered as part of the recently commissioned Service Review. Alternative options such as Freegle, Freecycle, and the HRRC are promoted on the Council's 'Special Collection' webpage. We are also looking to further focus on waste reduction activities this year, with a planned re-use project to be undertaken with schools from September.	A

ENF	ORCEMENT		
10	The task group recommends the formation of a strategic approach between Waste Public Realm Enforcement services and the CCTV service to ensure more use of the current CCTV provision to monitor IRD hotspots. It is understood that this will require collecting evidence and providing a supported case for each camera. (The task group endorses all of the recommendations on IRD made by the concurrent CCTV task group).	The Waste Enforcement team has established a closer working relationship with the CCTV team. Reflecting the recommendations of the CCTV Task Group, work is currently underway to review the current use of CCTV (including the Smart Cars) and the team has now acquired and is utilising a number of deployable cameras to monitor known problem areas. In addition, members of the team are now routinely manning cameras in the control room out-of-hours to target known hotpots, with very positive results. The team is also working more closely with the wider Community Protection Team (and other safer Brent partners), through regular attendance at LJAG meetings; and-following the recent formation of a corporate Enforcement Practitioners Group, there is now a more joined-up approach across all aspects of environmental enforcement, with a focus on working together to tackle specific problem hot-spots.	G
11	Waste management services, specifically trade and Environmental health services, must work together in a more strategic method; sharing information and working on joint visits were there is clear intelligence that there are crosscutting priorities.	The High Streets team has formed a High Streets Reference group which aims to meet on a quarterly basis to address many of the challenges that town centres across Brent face. The group also aims to ensure that there is streamlined coordination across all services and that any current or imminent action of the ground is or can be readily communicated back to the local business community. In addition, the new corporate Enforcement Practitioners Group has resulted in a more joined-up approach across all aspects of enforcement, with a focus on working together to tackle specific problem areas.	G

		The Envirocrime team is also now working more closely with Veolia's Trade Waste service, sharing intelligence and ensuring that businesses are supported to become compliant with waste management legislation. The 'starting a business' page has recently been updated on the council's website with a section for waste management to enable a new start up business to easily find the information they need on waste management. We have also provided links to a new scheme specifically aimed at SME's called 'Right waste right place'.	
12	A strategic approach between Housing Enforcement and Public Realm Enforcement services via Veolia should be formed to ensure that HMO landlords are educated as to their responsibilities regarding waste disposal for themselves and their tenants.	The Environmental Improvement Team has engaged with Private Sector Housing colleagues to look at the current licencing regime and consider options for more engagement. Proposals are in place to use the Private Sector Housing Newsletter to convey some IRD/LWYL messages. The newly developed Landlords Pledge on waste management was a recent example of such information being included in the newsletter. Trials currently underway of the voluntary 'Landlords Pledge' in May have shown three landlords with a total of 6 properties who have signed up to the pledge. We will continue to publicise this throughout the year. A piece of work commissioned by LEDNet, and being carried out by the consultants, Eunomia is currently being taken forward to look at the specific problems associated with waste management in the rented sector. This is due to report in October.	G
13	Enlist the support of night workers such as black cab drivers and night bus drivers to use the cleaner Brent app and report any perpetrators of	Contact has been made with Transport for London to make them aware of the work of the Task Group, to provide them with information regarding the Cleaner Brent App, and to seek their support with this objective.	Α

	IRD. This could be achieved by contacting taxi firms and Transport for London to explain our case and by asking them to cascade our request down to workers. The council would in turn be able to release positive press stories about these organisations.	The same request has been made to the taxi companies supporting Brent's Transport Service.	
14	We will look to pre-capitalise on new fly-tipping legislation, to be brought forward next year, by following a similar model to Ealing Council, as below: 'The council has teamed up with Kingdom Security to provide dedicated teams of uniformed officers in the borough. Kingdom Security will work with the council's environmental enforcement officers, providing a high-profile deterrent and issuing £80 fines. Operating initially on a one-year trial basis, Kingdom Security is working at no cost to the council. Instead they will take a share of the fines they issue'	Kingdom Security have been engaged on a 12-month trial basis from mid June 2016. The impact of this scheme is currently being actively monitored; with a report on the performance and impact of the first 6 months to be considered by Cabinet in January 2017	G
15	The Council should work with other local authorities and the National Flytipping Prevention Group to lobby the Government for more and effective	LBB is actively participating in the new LEDNet 'Rubbish Dumping' group; sharing best practice and looking to lobby regional and national government as required.	G
	enforcement powers.	The new Fly tipping FPN came into force in May allows Councils to issue fines of up to £400 for 'small' fly tips. The default fine levels for this new FPN are £200- or £120 for early payment. Proposals to set	

		local fines at the maximum level of £400 are to be considered shortly.	
16	The selective Landlord licensing scheme should be reviewed annually and reported on publicly with statistics on how effective the scheme has been, where it has been effective, areas where the council can strengthen its enforcement and any lessons learnt.	Private Housing have confirmed that since the launch of the licensing scheme which previously saw 180 properties in Brent with an HMO licence, there are now around 6,000 licenced properties. In addition over 30 landlords have been prosecuted since Christmas and have received collective fines totalling around £200,000, One landlord has been sent to prison for four months. The licensing scheme is proving to be effective. There have been no prosecutions to date for breaches of the waste management section of the licence agreement, and a project is	G
		being set up to strengthen the mechanism for Environmental Improvement and Veolia staff to be able to tackle landlords when breaches of the licensing agreement with regards to effective waste management are identified.	
17	The landlord licensing guidance should have more detail in the wording regarding waste & refuse, so that it is harder for landlords to avoid discharging their responsibilities effectively.	The Environmental Improvement Team has engaged with Private Sector Housing colleagues to look at the current licencing regime and consider options for re-wording regarding waste management. This process is currently underway and is being supported by the changes to processes mentioned in the previous action.	G
18	Leaflets on Brent's waste disposal policies should be inserted into the guidance so that landlords can give to tenants. The leaflet/insert scheme should also be rolled out to estate & letting agents.	Veolia are currently working with Daniels Estate Agents with a view to distributing fly-tipping leaflets to circa 40,000 homes. All tenants living in street level properties receive full information with pictorial guidance on waste management directly once a year. We are also considering providing service information with the council tax bill and looking at placing messages onto the opening page of the Single Sign on Portal for online service users.	G

IMP	ACT		
19	Further investigation is required into the impact of the garden waste collection charges. Cabinet should review its effectiveness from a cost and efficiency perspective, annually until 2018.	A review of the first 6 months of the garden waste subscription service was considered by Scrutiny Committee in January 2016. This confirmed no apparent impact on IRD as a result of the introduction of the chargeable subscription service. A further review is to be put in the forward plan for Jan 2017; and annually thereafter.	O
20	Owing to the lack of quantitative data to evidence the effects of the garden waste charge at this stage, officers should review and report the effects of its first year in operation. Officers should devise logical metrics against which it can compare its performance annually until 2018.	As above, Scrutiny Committee reviewed the financial impact, take- up of subscription service, impact on waste/ recycling tonnage and impact on fly tipping in January 2016. A further review is to be put in the forward plan for Jan 2017; and annually thereafter	G
21	The number of Brent residents that have signed up, and continue to sign up, to the Garden waste collection service should be more widely publicised. The Brent website and Brent magazine should be the media for this.	Garden waste subscription figures as of the end of July are just under 18,500, of which 16,000 are renewals and 2,500 are new subscribers. As part of a further promotion to encourage residents to sign up to the service for the remainder of the summer a direct mailing was sent out in August to those residents who have not yet renewed. A further article on the benefits of the garden waste service will be written for inclusion into the September issue of the Brent Magazine. We are also looking to publicise renewal of the garden waste service with the council tax bill.	G
	BLICITY		
22	Future publicity about IRD should be	Love Where You Live is initially a 12-month campaign- and the	G

	continuous, mainly word-of-mouth and not confined to one-off PR campaigns. The last major PR campaign in 2013 involved large, difficult-to-read signs under which rubbish was dumped. It also saw photo opportunities to show the lead member was determined to deal with the issue, but officers confirm that it had little tangible impact on levels of IRD.	LWYL messaging and branding will be integrated into everything the Council (and Veolia) do. The campaign has SMART targets attached to it, which will be closely monitored. There is a video on the use of the Cleaner Brent App which shows residents how easy it is to reporting IRD. This will be launched in September and promoted in the Brent Magazine and through Your Brent and all social media channels. We have also improved our communications through the use of social media to allow for a much more sustained and interactive campaign on IRD.	
23	Officers, councillors and community champions need to visit relevant local meeting places – whether they be religious meeting places, youth clubs or sports clubs – to pass on the council's messages about IDR and how communities can work with Brent to tackle it.	Veolia are actively involved in Community Group engagement – and have attended 8 events between April and July 2016. All uniformed groups have been emailed and advised of the availability of the education team to provide a session on IRD and recycling.	A
24	Leafleting campaigns led by the council and voluntary groups should be in multiple languages, appropriate to the socio-dynamics of the local area.	The Brent website now offers an automatic translation of all webpages into numerous community languages. Therefore all recycling pages and information is available through the 'translate' button. Officers are working with Veolia to consider how practically to provide translations of our service leaflets into various community languages as required.	A
25	Any future communications should also be easy-to-read with no conflicting messages. This should be backed up with targeted local	All communications material, both electronically based on the web and through hard copy service guides is written with plain English guidelines in mind, and uses as much pictorial imagery as possible to explain our services.	G

	advertising. Brent London Underground and National rail stations are prime locations for such advertising.	Alongside web-based and press activity, the Love Where You Live Campaign saw a poster campaign using JC Decaux boards across the borough, as well as a refresh of the advertising boards on all the refuse vehicles.	
26	The Cleaner Brent Cleaner App requires further publicity, and probably a re-launch, as not enough people are aware it exists. There should be further publicity on the web and in the Brent magazine.	The app is being widely promoted through the new Love Where You Live campaign. We are currently receiving around 500 reports a week on the app. The app was promoted in the June edition of the Brent Magazine. However we will also provide information on the app in the next issue of the Brent Magazine in September and also link this in with the video which shows residents how easy it is to use the app.	G
		Work has been undertaken to bring the management of the app inhouse, and broaden its remit to cover other environmental issues (such as highways defects, potholes and trees).	