

John Chapman Thursday 13th September

Kingdom Securities are offering you a No Cost Litter Enforcement Service.

Wow!. How?

Each time that a Fixed Penalty Notice (FPN) is issued, the payment is split, the majority going to Kingdom, the remainder to Council. Immediately this calls into question the priorities, as there is a huge conflict of interest, Profitable rather than effective enforcement.

Quantity rather than quality.

The objective of this contract is supposed to be a reduction in littering offences, however –

As a private company, the Kingdom goal will be maximising income

However, if littering levels fall, Kingdom's revenues fall

Therefore, to maintain income, Kingdom are effectively incentivised to fail

And they will fail, I can find no evidence that any private company handing out fines like confetti has had any positive effect on littering anywhere. In fact the opposite, it creates negativity, and bad feeling, especially when there are perceived Council failings, such as dropped litter by refuse collectors.

Each Officer has a minimum target of 4 FPN's per day. That equates to around 1,000 FPN's **per full time Officer** per year. That's a lot of money draining out of the local economy. A lot of hardship for families already struggling to make ends meet. Also contrary to the proposed draft DEFRA guidelines specifically stating that enforcement should not be target driven

The law - I have sent you all a copy of S87 of the EPA, so you know that accidental littering is NOT an offence, and that an offence only occurs once intentionally dropped litter is left.

This is from the Kingdom website -

“Crucially, section 87 of the EPA states that it is a criminal offence to drop, throw down, leave or deposit litter in a public place”

No it doesn't!

Do the law enforcers not understand the only law they are alleged specialists at enforcing? Just one law, and they get it wrong.

Will the officers be more likely to check the Company website or the actual law?

How will the Council ensure that Kingdom are enforcing the correct law, and following the DEFRA guidelines?

Profit motive, not clear on law, what safeguards are there likely to be?

In a word, None.

In other areas where Kingdom operate, there is

- No independent appeal service.
- All correspondence will be dealt with by Kingdom staff, within Council premises, and using Council headed notepaper.

Kingdom - Judge, jury, executioner, AND masters of disguise.

Kingdom do explain the appeal option -

Everyone issued with an FPN is afforded the right to appeal to a Magistrates court, however if found guilty could result in a criminal conviction.

Aside from being barely literate, it's misleading yet again. Being found guilty of littering will not lead to a criminal conviction, you can only get a criminal conviction for non payment of the fine.

A number of Councils have recently ditched Kingdom for being over-zealous, they are described in Kirklees as rude and aggressive.

So I will ask you – What safeguards will be in place?

This is not supporting littering, it is supporting fair, lawful and proportionate litter enforcement, and adherence to Government guidelines.

Together we can tackle litter.

Use the stick, lose the support of the people.