

## 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:** Haringey Borough Wide Public Spaces Protection Order  
**Service Area:** Safer, Stronger Communities  
**Officer Completing Assessment:** Joan Appavoo-ASB Enforcement Manager  
**Equalities Advisor:** Diptasri Basu  
**Cabinet meeting date (if applicable):** 12<sup>th</sup> March 2024  
**Director/Assistant Director** Barry Francis/Eubert Malcolm

### 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).

The Cabinet are being asked for permission to consult on the implementation of a borough wide PSPO with the following restrictions:

- Consuming intoxicating liquor (alcohol) in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress. The PSPO doesn't ban the drinking of alcohol in a public space, the offence is failing to comply with

an officer's request within the restricted area of the PSPO, to stop drinking and/or surrender alcohol.

- Without reasonable excuse, using, sharing, or supplying others with any psychoactive substances (including Spice and other substances known for legal highs) or marijuana/weed, in any public place.
- Without reasonable excuse, being in possession of any drug paraphernalia (including cannabis grinders or crack cocaine pipes), in any public place, without reasonable excuse.
- Behaving in a manner that causes, or is likely to cause, harassment, alarm, or distress to any person(s), without reasonable excuse.
- Not to clean up after your dog in a public place and not having the means to do so
- Urinating, defecating or spiting in the restricted area, without reasonable excuse.
- Riding a bicycle, moped, e-scooter on pavements and/or in a manner likely to cause obstruction, alarm, distress or annoyance to members of the public or cause criminal damage by their use.
- Lighting a firework in any public space unless that person, or organisation, has a licence from Haringey Council permitting this to happen in that location.

We propose to consult with residents for a period of 12 weeks. The statutory public consultation will take place between March to June 2024.

The penalties for breach of the PSPO are a fixed penalty of £100.00 or a maximum fine of £1000.00 on conviction.

The PSPOs will assist the Council and the police to tackle anti-social behaviour, resulting in a reduction in individuals engaging in anti-social behaviour such as, that arising from the consumption of alcohol.

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

However, there are exemptions:

- a person who is registered blind or who has a disability which affects their mobility and who is registered disabled is exempt from cleaning up after their dog.
- In respect of drug paraphernalia, a person has a prescribed medical need for personal medication for example an Epinephrine injector (EpiPen).
- An illnesses or disability that hinders a person's ability to avoid urinating/defecate in public.
- The enforcement services work very closely with support services and will be adopting a measured approach when dealing with breaches of the PSPO, individuals will be offered advice and support, where mitigating circumstances are identified e.g. mental health, street homelessness, or other vulnerabilities

### 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.

A statutory consultation needs to be undertaken before a decision can be taken. The period of consultation will run for 12 weeks in the period March 2024 to June 2024.

The Council will ask those participating in the consultation to provide equalities data in line with protected characteristics identified within the Equality Act 2010. Data obtained will be used to understand if the proposal will disproportionately impact on groups with protected characteristics.

The Council recognises that certain groups with protected characteristics and/or people of certain socioeconomic groups, are often poorly represented in public consultation feedback. Therefore, the consultation will ensure a targeted approach to reach marginalised or disadvantaged groups, for example,

- Organising pop-up event or attending residents' groups or surgeries on estates, particularly in parts of the borough where deprivation is at its highest.
- Working with support services such as HAGA or The Grove to speak directly with their users/members.
- Reaching out to faith and community groups, visiting these organisations in person to promote understanding of the consultation and assist the participation of members in the consultation process.
- Making direct contact with schools, colleges and youth support services – to encourage greater participation from under 25s.
- Liaise with Thames reach and Mulbery Junction (homelessness one stop shop) to enhance dialogue with and participation of their users and stakeholders supporting street population.

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 Council undertook a co-design consultation between 10th and 31<sup>st</sup> January 2024. Prior to this period the matter of a borough-wide Alcohol control was discussed with stakeholders at meetings such as Ward Panels, LCSP, resident association meetings, Neighbourhood Watch Association meetings and other partnership meetings.

The co-design process included two pop up events. In addition, officers attended various resident/stakeholder-based meetings to advise on the co-design consultation process, encourage participation and answer any additional questions residents had with regard to PSPOs and the proposals. These meetings included Ward Panels (Seven Sisters, St Ann's Bounds Green and Woodside Wards), Ladder Community Safety Partnership, Noel Park Residents Association meeting, Love Finsbury Park (Clear Hold Build).

Details of the co-design consultation were also emailed to over 200 services, community groups and organisations, individual stake holders, faith groups and residents' groups to distribute to their users and members.

A full detailed analysis of the co-production outcomes can be found in the report at Appendix 2

Key issues that arose in the context of protected characteristics and socio-economic groups were:

- *There was no participation from anyone younger than the age group 22-29, in the codesign process.*
  - There will be targeted action to reach our younger population in the proposed full consultation.
- *It was commented that using surveys online exclude a huge number of residents from inclusion to make and pass policy.*
  - The proposed consultation will include a hard copy of the survey which will be made available at libraries and other venues and when facilitating events or attending meetings.
- *It was commented that PSPOs will criminalise vulnerable and marginalised groups. , but not made clear who this is specifically referring to.*
  - The authorised officers who monitor and enforce the PSPO have and will continue to consider the needs of the individual and their personal circumstances in order to make an informed, balanced and equitable decision as to the appropriate action to take. This includes completing an Equality Impact Assessment prior to prosecution, during which consideration is given to any vulnerability and support needs, to ensure that any prosecution is proportionate, necessary and fair.
- *It was commented that PSPO powers can be used in a negative and discriminatory way against those who are homeless and begging. Many homeless people use alcohol to ward off the cold etc. and should be helped rather than penalised.*
  - The proposed PSPO is not imposing a complete ban on alcohol in a public space. The prohibition is with regard to the nuisance behaviour associated with the consumption of alcohol.
- *It was commented that PSPO seem to be used largely against ethnic minority groups.*
  - There is no evidence that the use of PSPOs in Haringey or indeed anywhere else, has disproportionately been used in respect of any ethnic minority 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 Profile<sup>1</sup>

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

#### Target Population Profile

- 0-17 (XX%)
- 18-34 (XX%)
- 35-49 (XX%)
- 50-64 (XX%)
- 65+ (XX%)

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023  
Strategic Needs Assessment 22-23  
Residents survey 2021  
Census 2021

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?

Prior PSPOs in Haringey have demonstrated that the use of this power has not had any detrimental impact on any age group where it has been exercised.

Haringey has a relatively young population with 21% of the population being 17 or under, 48% aged between 0-34 and only 10% 65+.

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

We recognise through the co-design process that participation from young people in consultations is poor therefore we will actively seek to consult with young people to ensure their views on the borough wide PSPO proposal are captured and taken into consideration. Where possible officers will attend institutions and meetings in person to further explain the proposal and respond to any questions.

**Therefore, we anticipate a positive impact from the consultation on all those who share protected characteristics by age. The consultation would also help us identify and offer mitigations necessary to tackle any negative impacts.**

### **Potential Impacts**

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

We have no evidence that the use of the PSPO power has a detrimental impact on any particular age group.

Safety is a concern for all age groups and therefore the borough wide PSPO should have a positive impact across all ages. All ages will benefit from improved cleanliness and a safer borough.

## **4b. Disability**

### **Data**

#### **Borough Profile**

- Disabled under Equality Act – 13.7%<sup>2</sup>
  - 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 depression<sup>3</sup>
- 1.7% of residents diagnosed with a severe mental illness<sup>4</sup>
- 0.4% of people in Haringey have a learning disability<sup>5</sup>

#### **Target Population Profile**

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

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<sup>2</sup> Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/briefingsandreports/articles/2021-03-18-disability-england-and-wales)

<sup>3</sup> NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-improvement/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18/)

<sup>4</sup> NHS Quality Outcomes Framework – [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](https://www.nhs.uk/quality-improvement/prevalence-of-diagnosed-mental-health-diagnosis-among-gp-registered-population-age-18/)

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

State of the Borough 2023  
Strategic Needs Assessment 22-23  
Residents survey 2021  
Census 2021

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?

Prior PSPOs in Haringey have demonstrated that the use of this power has not had a disproportionately detrimental impact on disabled people.

9% of the respondents of the Co-design survey stated they had a disability. We will ensure that details of the proposed public consultation for the borough wide PSPO is shared with services and user groups linked to disabilities e.g. mental health, autism, learning disabilities, where possible, officers will attend meetings in person to further explain the proposal and respond to any questions. To ensure this group's views on the borough wide PSPO proposal are captured and taken into consideration.

### **Potential Impacts**

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

We have no evidence that the use of the PSPO power has a detrimental impact on any people with disabilities.

Disabled people are significantly more likely to be victims of crime than non-disabled people. The borough-wide PSPO could therefore have a disproportionately positive impact on many disabled people.

In Haringey mental health is a particularly concerning area of disability<sup>6</sup>.

- In the most deprived areas of Haringey, diagnoses of serious mental health illness are 170% higher compared to other areas.
- One in four people in Haringey will experience some form of mental illness during the lives.
- Approximately one in six people report experiencing a common mental health problem (such as anxiety and depression) in any given week.
- The pandemic has led to unprecedented levels of anxiety, depression, loneliness and social isolation in Haringey.

Fear of crime, harassment, abuse and intimidation will exacerbate any existing mental health issue and deterioration of one's mental well being is often cited by residents

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<sup>6</sup> [PowerPoint Presentation \(haringey.gov.uk\)](https://www.haringey.gov.uk)

reporting anti-social behaviour. Tackling anti-social behaviour through a borough-wide PSPO will be assisting to create a safer and cleaner environment and therefore have a positive impact upon wellbeing of residents living with mental health issues.

It is also recognised that street drinking and drug use is likely to be higher among the homeless and that they are more likely to suffer from mental ill-health. 80% of homeless people in England reported that they had a mental health issue, with 45% having been diagnosed with a mental health condition.<sup>7</sup> The Council therefore promotes a joined up approach with support services. Enforcement officers are well versed in adopting an initial support and intervention approach, sign posting persons to appropriate services. Enforcement is pursued once all avenues of engagement are exhausted, unless there is significant risk of harm to the individual and/or others.

It is also recognised that people with mobility problems or visual impairments may find it more difficult to comply with some of the prohibitions of the PSPO. Therefore, there are exemptions regarding compliance, e.g.

- dog fouling - a person who is registered blind or who has a disability which affects their mobility and who is registered disabled is exempt from cleaning up after their dog.
- Urination, defecation & spitting.

## **4c. Gender Reassignment**

### **Data**

#### **Borough Profile<sup>8</sup>**

- 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**

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023  
Strategic Needs Assessment 22-23

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<sup>7</sup> [About Us | Mind in Haringey](#)

[Homelessness: statistics | Mental Health Foundation](#)

[Homelessness and mental health | Crisis UK](#)

<sup>8</sup> Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)



Residents survey 2021  
Census 2021  
Office for National Statistics

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?

Prior PSPOs in Haringey have demonstrated that the use of this power has not had a disproportionately detrimental impact based on gender reassignment.

In Haringey there were 10 recorded transgender hate crimes for the period April 22-31<sup>st</sup> March 23 this is a 0% decrease on the same 12-month period in 21/22.

According to ONS 2021 1.24% of people aged 16 years and over in Haringey have a gender identity different from their sex registered at birth.

While recorded crimes remain low, we have noticed through informal reports that the transgender community is often targeted as victims of crime based on prejudice related to gender reassignment. Particularly via online mediums and social media. Unfortunately, such incidents are frequently underreported, possibly due to a lack of trust and confidence in the perception around police's understanding and handling of cases with respect and sensitivity.

### **Potential Impacts**

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

Violence against transgender people is a grave concern, with significant impacts on their safety, well-being, and human rights. Hate crime and discrimination can include anti-social behaviour arising through alcohol or drug consumption and involve behaviour causing harassment, alarm and distress, hence tackling these behaviours is likely to have a positive impact on this group.

## **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 <sup>9</sup>**

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<sup>9</sup> Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

- 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

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023  
Strategic Needs Assessment 22-23  
Residents survey 2021  
Census 2021  
Office for National Statistics

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?

Prior PSPOs in Haringey have demonstrated that the use of this power has not had a disproportionately detrimental impact based on people under this protected characteristic.

Haringey has relatively low levels of marriages at 35.8%, compared to England average of 46.9%.

According to the Equalities profile of Haringey<sup>10</sup>, the borough has a higher proportion of couples in a registered same-sex civil partnership compared to both England and London, specifically,

- In Haringey 0.6% of residents (equivalent to 1,191 people) are in a registered same sex civil partnership
- By contrast the proportion for England is 0.2% and for London 0.4%

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<sup>10</sup> [equalities profile of haringey.pdf](#)

## Potential Impacts

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

There are no known equalities issues related to marriage and civil partnership in relation to this report. For this reason, although the measures are likely to be positive overall, the impact has been noted as neutral.

Couples in same-sex civil partnerships may be more likely to experience hate crime and discrimination. Hate crime and discrimination can include anti-social behaviour arising through alcohol or drug consumption and involve behaviour causing harassment, alarm and distress, hence tackling these behaviours is likely to have a positive impact on this group.

## 4e. Pregnancy and Maternity

### Note<sup>11</sup>:

- 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 <sup>12</sup>

Live Births in Haringey 2021: 3,376

## Target Population Profile

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

There are no data sources known in Haringey in relation to pregnancy.

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?

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<sup>11</sup> Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](#).

<sup>12</sup> Births by Borough (ONS)

Prior PSPOs in Haringey have demonstrated that the use of this power has not had a disproportionately detrimental impact based on pregnancy and maternity. In fact, the measures are anticipated to ensure a safer and cleaner borough, which may particularly positively impact pregnant women or young mothers.

### **Potential Impacts**

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

There are no known equalities issues related to pregnancy and maternity in relation to this report. For this reason, although the measures are likely to be positive overall, the impact has been noted as unknown or neutral.

If pregnancy and maternity are a mitigating factor in any breach it will be taken into consideration, to ensure that any enforcement is proportionate, reasonable and fair.

## **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.<sup>13</sup>

### **Data**

#### **Borough Profile**<sup>14</sup>

##### Arab: 1.0%

- Any other ethnic group: 8.7%

##### 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%

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<sup>13</sup> [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/anti-discrimination-law/race-discrimination)

<sup>14</sup> Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/census2021)

- 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**

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

*State of the Borough 2023*  
*Strategic Needs Assessment 22-23*  
Residents survey 2021  
*Census 2021*

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?

Prior PSPOs in Haringey have demonstrated that the use of this power has not had a disproportionately detrimental impact based on Race.

Haringey is the 5<sup>th</sup> most ethnically diverse borough in the country, with over 65% of its residents coming from non-white British communities. 29.7% of Haringey residents do not speak English as their main language. This is the 6<sup>th</sup> highest rate in London and is above the statistical neighbour and London averages. 180+ languages are spoken. This vibrant mix of cultures contribute to the rich tapestry of life in the area.

People of White and White Other ethnicity make up the largest proportion of Haringey's population, followed by those of Black, Mixed/other and Asian ethnicity. In 2021 Census approximately 57% of the population identified their ethnic group as 'White' and 17.6% as Black

Higher proportion of ethnic minority groups are in the east of the borough specifically Northumberland Park, Bruce Castle, Tottenham Hale, White Hart Lane and Seven

Sisters, in contrast, a lower prevalence of ethnic minority groups is seen in Muswell Hill, Crouch End, Highgate and Alexandra Park. This mirrors geographical locations of victims of hate crime. According to MPS data the majority of hate crime occurs in the East, and therefore a higher concentration of resources may be applied to residents in the East rather than the west, of whom have a higher proportion of non-ethnic minority groups.

### Potential Impacts

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

The impact of race and ethnicity is a complex issue and it cannot be easily categorised as purely positive, negative or neutral.

The Commission on Race and Ethnic Disparities found in 2021 that Ethnic categorization itself is not a risk factor for involvement in violent crime, drug use, gang activity, property offences or anti-social behaviour. Research shows that crime outcomes result from a complex interaction between environmental and personal influences, rather than being directly linked to ethnicity<sup>15</sup>.

We do recognise that young black males face disproportionate impacts from violence, particularly in urban areas:

- *Black Britons, though constituting only 13% of the capital's population, account for almost half of murder victims and suspects.*
- *Police Violence: For young black men, lethal force by law enforcement ranks as the seventh leading cause of death. They are at disproportionate risk compared to white men*<sup>16</sup>.
- *Unfair Treatment: Concerns persist about unfair treatment of minorities in crime and policing*<sup>17</sup>.

The co-design process undertaken generated concerns that PSPO powers would be used to target ethnic minorities. Prior PSPOs in Haringey have demonstrated that the use of this power has not been disproportionately exercised on the basis of race or ethnicity.

Through monitoring the implementation and enforcement of the PSPOs, we will continue to identify and address any equality implications on the basis of race and/or ethnicity.

The proposed consultation will include targeting community and youth groups, providing information about the consultation and offering attendance at meetings or forums to clarify the proposal and respond to any concerns, to promote feedback from ethnic minority groups, particularly young black males.

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<sup>15</sup> [Understanding ethnic disparities in involvement in crime – a limited scope rapid evidence review, by Professor Clifford Stott et al - GOV.UK \(www.gov.uk\)](#)

<sup>16</sup> [PolitiFact | Police violence is a leading cause of death for young Black men, but it doesn't top the list](#)

<sup>17</sup> [Crime and policing - GOV.UK \(www.gov.uk\)](#)

All races and ethnicities are likely to benefit from improved safety and cleanliness. However, according to police categorisations, the most common ethnicity of victims of crime in Haringey is White North European (representing 46% of all victims), followed by Black victims (27%) and White South European (16%). Therefore, while all race and ethnicities would be positively impacted by improved safety, those ethnicities are likely to be the most positively impacted. Further, ethnic minorities who may be vulnerable to abuse, harassment and behaviour categorised as hate crime, would be positively impacted through a safer borough where those behaviours (where induced by alcohol or intoxicating substances) are tackled through PSPOs.

## 4g. Religion or belief

### Data

#### Borough Profile <sup>18</sup>

- 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

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023

Strategic Needs Assessment 22-23

Residents survey 2021

Census 2021

Haringey is one of the most religiously diverse places in the UK. The most common religion is Christianity, accounting for 39.3% of residents. The next most common religions are Islam (12.6%) and Judaism (3.6%). Haringey has a lower percentage of residents who are Hindu (1.3%) Buddhist (0.9%) and Sikh (0.3%)

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<sup>18</sup> Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

The proportion of Haringey residents saying they are Christian (39.3%) is in line with statistical neighbour boroughs (39.2%), and is slightly below London (40.6%), while Haringey residents are more likely to identify as having no religion (31.6% compared to 27.6% among statistical neighbours and 27% in London)

There were 72 faith hate crimes recorded by the police in 22/23, this is a 6.5% decrease for the same period 21/22

There were 35 anti-Semitic hate crimes recorded by the police in 22/23, this is a 16.7% decrease for the same period 21/22

There were 29 Islamophobic hate crimes recorded by the police in 22/23, this is a 26.1% increase for the same period 21/22

According to the 2021 residents survey respondents who are Muslim are more likely to feel unsafe when outside after dark in their local area (20%)

The dynamics of hate crime are subject to fluctuations influenced by geo-political events. Since October 2023, there has been a notable increase in anti-Semitic hate crime and Islamophobic directly linked to the Israel/Gaza conflict. This surge will significantly impact our reports and given that resource allocation is somewhat data-driven, it might result in a disproportionate focus on for example a particular community at any specific give time especially following a regional, national or global event or when conflict occurs.

- There were 34 Anti-Semitic hate crimes recorded by the police in the period October -2023- November 2023 this is a 118.8% increase for the same period in 2022.
- There were 16 Islamophobic hate crimes recorded by the police in the period October -2023- November 2023 this is an 88.9% increase for the same period in 2022.

### **Potential Impacts**

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

Hate crime can disproportionately impact people from religious communities. the alcohol PSPO is likely to positively impact people from religious communities.

Hate crime and discrimination can include anti-social behaviour arising through alcohol or drug consumption and involve behaviour causing harassment, alarm and distress, hence tackling these behaviours is likely to have a positive impact on this group.

Introducing a borough wide PSPO to assist in tackling and reducing anti-social behaviour is likely to have a positive impact on all religious groups, as doing so will create a safer environment.



The proposed consultation will make direct contact with faith groups, providing information about the consultation and offering attendance at meetings or forums to clarify the proposal and respond to any concerns.

## 4h. Sex

### Data

#### Borough profile <sup>19</sup>

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

### Target Population Profile

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023  
Strategic Needs Assessment 22-23  
Census 2021  
Residents survey 2021

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?

Of the 264 population of Haringey 137,000 are women (51.9%) and 127,200 are men (48.1%) .

In Haringey 15% of residents feel unsafe in their local area after dark. In some wards in the eastern part of the borough, this feeling of insecurity rises to above 40%<sup>20</sup>.

These concerns highlight the need for on going efforts to improve the safety for women and address issues related to violence against women and girls (VAWG). Fear of crime is higher amongst women than among men.

The Haringey Residents Survey found that 19% of women felt unsafe when outside their local area after dark, compared to 10% of men.

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<sup>19</sup> Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/identityandgender/census2021)

<sup>20</sup> [Haringey annual public health report 2023](#)

The safety of women is a critical public health issue and it is essential to create spaces where everyone feels secure. Initiatives such as installing floor stencils with the message “Are you okay?” along Seven Sisters Road aim to raise awareness and promote safety for women and girls in the community<sup>21</sup>. The Borough wide PSPO addressing behaviour linked to alcohol and drug abuse, prohibiting harassment, alarm and distress, and other activities that make people feel unsafe and intimidated will further assist every, but women in particular, to feel safe in their community.

### **Potential Impacts**

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

The intension of the PSPO's is to make residents feel safer by tackling anti-social behaviour and to have a cleaner borough. This will apply to residents regardless of sex.

Females are more likely to feel unsafe than males especially after dark (Residents Survey). Therefore, the alcohol PSPO is likely to have a greater positive impact on women than men.

## **4i. Sexual Orientation**

### **Data**

#### **Borough profile <sup>22</sup>**

- 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**

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023  
Strategic Needs Assessment 22-23  
Census 2021  
Residents survey 2021

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<sup>21</sup> [Improving safety for women and girls | Haringey Council](#)

<sup>22</sup> Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

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?

Based on 2020 mid-year estimates, Haringey's gay, lesbian and bisexual community consists of over 8,900 gay and lesbian residents aged 16+, and over 4,400 bisexual residents aged 16+. LGBT residents are more likely to experience hate crime which can impact their safety and well-being.

A recent Galop survey found that, nationally, 4 in 5 LGBT people have experienced hate related crime related to their gender identity or sexual orientation in their lifetime (79%)

There were 109 homophobic hate crimes in Haringey for the year 22/23. This is a 7.6% decrease on the same 12-month period in 21/22.

### **Potential Impacts**

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

Lesbian, gay and bisexual people are more likely to experience hate crime. It can therefore be assumed that improving safety will have a positive impact for this group.

## **4j. Socioeconomic Status**

### **Data**

#### **Borough profile**

##### **Income**

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023<sup>23</sup>
- 19.6% of residents were claiming Universal Credit as of March 2023<sup>24</sup>
- 29.3% of jobs in Haringey are paid below the London Living Wage<sup>25</sup>

##### **Educational Attainment**

- Haringey ranks 25<sup>th</sup> out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)<sup>26</sup>
- 3.7% of Haringey's working age population had no qualifications as of 2021<sup>27</sup>

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<sup>23</sup> ONS – [ONS Claimant Count](#)

<sup>24</sup> DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](#)

<sup>25</sup> 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](#)

<sup>26</sup> DfE – [GCSE attainment and progress 8 scores](#)

<sup>27</sup> LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

- 5.0% were qualified to level one only<sup>28</sup>

### **Area Deprivation**

Haringey is the 4<sup>th</sup> 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.<sup>29</sup>

### **Target Population Profile**

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

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

State of the Borough 2023  
Strategic Needs Assessment 22-23  
Borough Ward Profiles  
Residents survey 2021  
Census 2021

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?

According to ONS data 32.3% of people aged 16years and over in Haringey are economically inactive.

35% of children in the borough lived in households with an income of less than 60% the UK median after housing costs have been subtracted in 2021/22. This was around the same as the average London Borough.

In Haringey, 19.2% of residents were estimated to be earning below the Living Wage in 2022. This was around the same as the average London Borough.

3.6% of adults in the borough had no recognised qualifications in 2021. This was better than the average London Borough.

Haringey owed 0.45 per 1,000 households a main homelessness duty in 2022 Q4, around the same as the average London Borough.

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<sup>28</sup> LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](https://www.local.gov.uk)

<sup>29</sup> IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

In and 2023 there were 15.9% of working-age residents of Haringey on out-of-work benefits. worse than the average London Borough.

There were 3.91 repossessions by county court bailiffs per 1,000 in Haringey in 2022 Q2 - 2023 Q1, worse than the average London Borough.

*Socioeconomic factors significantly impact crime rates, with poverty, unemployment, inequality, and other related factors playing a central role. Understanding this relationship is crucial for developing effective crime prevention strategies that address the root causes of criminal behaviour<sup>30</sup> and are currently being explored and incorporated into the Borough Community Safety Strategy.*

### **Potential Impacts**

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

The main and positive aspect of a borough wide PSPO is that it will be aiming to improve safety and well-being for all residents, visitors and businesses by addressing anti-social behaviour. By reducing detrimental behaviours, the PSPO can contribute to a better quality of life in public spaces.

While PSPOs enhance safety, their socioeconomic impact requires careful consideration to avoid unintended consequences for vulnerable groups e.g. homeless population, people with mental health issues.

To minimise any negative impact implementation, monitoring and enforcement of the PSPO must essentially strike a balance between addressing anti-social behaviour and safe guarding. Equality impact assessments would be completed to ensure fairness and proportionality, and interventions would involve local communities and support services to ensure a holistic approach.

## **5. Key Impacts Summary**

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

It is expected that the Borough wide PSPO will yield positive outcomes for all groups characterised by a protected characteristic. The primary aim of the PSPO is to tackle anti-social behaviour to create a safer and cleaner environment for all residents, and everyone working or visiting the borough. It aims to benefit a diverse range of individuals without discrimination, fostering a safer, more supportive and equitable environment.

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<sup>30</sup> [The impact of socioeconomic factors on crime rates. \(alliedacademies.org\)](https://alliedacademies.org)

## 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?

*Considering intersectionality is crucial in discussions about crime and anti-social behaviour because it enables a deeper understanding of how various forms of discrimination can intersect and exacerbate each other, resulting in more complex and severe experiences of victimisation. For instance, an individual who identifies as queer or trans and is also Black or Muslim may face heightened discrimination and prejudice, thereby increasing their susceptibility to experiencing a crime.*

*A young black male, living in a single parent household in the east of the borough in overcrowded housing conditions with historical familial unemployment and lack of educational attainment is more likely to become involved in crime and or become a perpetrator or victim of violence.*

The PSPOs are likely to have a positive impact on all regardless of any held protected characteristic. We do not have data to suggest that any groups that cross two or more equality strands have been more or less affected by previous PSPOs within the borough or would be more or less affected by the proposed borough wide PSPO.

Through monitoring the implementation and enforcement of the PSPOs, we will continue to identify and address any equality implications for groups that have one or more protected characteristic.

## 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

Through the co-design process we have identified groups whose views were poorly represented and groups which respondents felt might be adversely impacted by the proposed borough-side PSPO. These are highlighted below:

- Young people
- People from non-white UK ethnic origin
- Street homeless and those rough sleeping
- People with drug & alcohol abuse issues
- Residents in the East of the borough and in more deprived wards
- People with mental health issues
- Other religious groups – i.e. non-Christian and no religion/atheist groups

- LGBT representation

The proposed public statutory consultation will endeavour to be as inclusive as possible and target these identified groups to ensure they are able to make contribution to the consultation and the shaping of the borough-wide PSPO. This will be done by initial approach to targeted relevant groups, organisations and stakeholders. Officers will attend meetings/forums with users and members to provide further information and clarity about the PSPO, answer any questions and assist with the completion of the on-line survey. A hard copy of the survey will also be made available.

## **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?

The local authority recognises that people who are registered blind, have a mobility issue, those with assistance dogs would struggle to comply with the requirements of the Dog Control aspects of the PSPOs. Therefore, these groups have been and will continue to be exempt from prosecution if found to be in breach of the dog control provisions of the PSPOs.

Enforcement Officer will continue to operate a holistic approach when monitoring and enforcing a PSPO. Support and intervention will initially be undertaken to address alcohol abuse, drug abuse and other related issues, through referrals to and joint working with outreach services; providing individuals with the opportunity to engage in support and rehabilitation, prior to any decision to take any enforcement action.

Ensuring fairness in the application of the PSPO is critical. Currently the Enforcement Team does not hold any data regarding activities relevant to existing or previous PSPOs in the borough, as they are often short interventions and collecting equality data would be disproportionate.

There have been zero prosecutions under PSPOs within the borough.

There have been no formal complaints about the existing PSPOs, which have been in operation in the Borough since October 2017. We therefore have no reason to believe that the PSPOs have been applied disproportionately or that any protected group would be disproportionately negatively affected in the future. To ensure this continues, the following actions will take place:

- The authorised officers who will monitor and enforce the PSPO have and will continue to consider the needs of the individual and their personal circumstances in order to make an informed, balanced and equitable decision as to the appropriate action to take. This includes completing an Equality Impact Assessment prior to prosecution, during which consideration is given to any vulnerability and support needs, to ensure that any prosecution is proportionate, necessary and fair.
- Officers of the ASB Enforcement Team will keep up to date with any available Equalities training.

- Issues & concerns will be regularly discussed in supervisions & at team meetings, to ensure that equality and fairness are fundamental considerations in any decision relating to enforcement.
- Anyone issued a fine does have the right of Appeal or right to raise a complaint, which would be investigated and responded to by a senior manager.
- Any abuse of discretion when enforcing the proposed PSPO would be addressed swiftly using appropriate internal procedures, which could include further training or period of monitoring.

## 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/N**

#### No Major Change to the proposal

**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 **Y/N**

#### No adjustments to the proposal

**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. **Y/N**

#### Not applicable

### 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?

**No negative impact identified at this stage**

Action:

**Not Applicable at this time– but may be subject to change following statutory consultation**



Lead officer: **Joan Appavoo**

Timescale: **To be reviewed following statutory consultation (if approved) July 2024**

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

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

**Not Applicable**

## **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?

The PSPOs will be monitored regularly throughout the life of the orders to ensure that any equalities issues are dealt with should they arise.

The feedback within the statutory public consultation in respect of the implementation of a proposed borough wide PSPO, will also be monitored. Community and faith groups, relevant stake holders and support services will be contacted to encourage participation where it is apparent that the level of response from certain protected groups, socio economic groups or geographical areas, is poor or disproportionate, given the borough's demographics.

**Date of EQIA monitoring review:**

**July 2024 – following statutory consultation (if approved)**

## **8. Authorisation**

EQIA approved by (Assistant Director/ Director)

**Eubert Malcolm**

Date

**8 March 2024**

## **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.