

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: Jessica Russell

Cabinet meeting date (if applicable): 14th October 2024

Director/Assistant Director Barry Francis/Eubert Malcolm

2. Executive summary

The Cabinet are being asked for approve the implementation of a 3-year borough wide PSPO with the following restrictions:

1. 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 does not 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.
2. Not to clean up after your dog in a public place and not having the means to do so
3. Urinating in a public space in the restricted area, without reasonable excuse.
4. Defecating in a public space in the restricted area, without reasonable excuse.

5. Riding a bicycle, moped, e-scooter on pavements in the restricted area, in a dangerous or reckless manner, that is likely to cause obstruction, alarm, distress or annoyance to members of the public or cause criminal damage by their use
6. Lighting a firework in any public space unless that person or organisation, has a licence or appropriate authorisation from Haringey Council permitting this to happen in that location.

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, we noted that some of these restrictions had the potential to negatively impact some groups with protected characteristics. We have mitigated this by including exemptions e.g. for street homeless people (socioeconomic status), elderly and disabled people (age/disability), children, as summarised below:

- 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 (restriction 2).
- Any person who is verified street homeless and/or any person who has a mental or physical condition, which would hinder their ability to avoid urinating/defecating in public (restrictions 3 and 4).
- Any electrically powered scooter designed for people with restricted mobility, including those who are elderly or disabled person, and children would be exempt from restriction 5. Discretion will be used if cyclists lack confidence to ride on the road or are intimidated by traffic

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, learning disabilities, street homelessness, or other vulnerabilities

3. Consultation and engagement

3a. Co-design and Consultation Phases

We conducted two periods of consultation. The first period was a 'co-design period' between 10th and 31st 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.

Following Cabinet approval on 18 March 2024, the ASB Enforcement Service undertook a 12-week period of statutory public consultation commencing on 25 March 2024; this was extended for a further 6 weeks of public consultation, ending on 2 August 2024.

In reference to consultation methodology, feedback was gathered from a range of outlets. An online survey was offered alongside in-person engagements with people from protected and marginalised groups. These in-person engagements included direct engagement, where participants had the opportunity to engage in detailed discussions with officers and raise concerns or questions about the proposal. In addition, we reached out to a diverse range of colleagues, partners, and community groups to attend their partnership meetings and regular forums.

Presentations to organisations and community groups served as yet another avenue through which valuable feedback was obtained, allowing for deeper insights into the specific needs and perspectives of different communities. In addition to public engagement, Haringey council staff were also invited to participate in the survey.

During the 19-week engagement we reached out to over 200 services, groups, organisations, and individuals:

- Email sent out to 83 individuals who provided their email contact during the co-production process in January 2024

- Email sent to 48 services & officers requesting their response and dissemination of the consultation details. This included HRS, Public Health, drug & Alcohol services, Parks, voluntary sector, faith and community groups, Housing, engagement services, connected communities, police, community safety, regeneration services and homelessness outreach
- Email disseminated to wide range of council services for dissemination.

In June 2024 officers acknowledged a lack of response from marginalised and protected groups and further efforts were made to reach out to these groups.

Information was sent out along with an offer to meet these groups and their users, this included black and ethnic minority groups, all schools in Haringey, young people services and groups, refugee and asylum seekers organisations, mental health, and disability services and multi faith groups.

In addition to the above we undertook 46 public engagements with groups including young people services, voluntary sector, disability groups, black and ethnic minority groups, drug and alcohol services and homelessness services.

All direct public engagements are listed below:

Name	Area of interest	Type of contact	Date
Marcus Garvey Library	Members of the public	Pop-Up event	9/5/24
Wood Green Library	Members of the public	Pop-Up event	10/5/24
Hornsey Library	Members of the public	Pop-Up event	16/5/24
Northumberland Park Resource Centre	Members of the public	Pop-Up event	20/5/24
Week Of Action Hub - Highgate	Members of the public		22/5/24
BUBIC	Drug Support	Presentation & Meeting	15/7/24
Bulgarian Centre	BME – Bulgarian/Roma	Meeting	18/7/24
Disability Action Haringey	Disability Support	Presentation & Meeting	16/7/24
Gypsy, Roma, Travellers Service	GRT	Presentation & Meeting	8/7/24
Haringey Alcohol Recovery Group HAGA	Alcohol Support	Presentation & Meeting	21/6/24
HAGA	Alcohol Support	Workshop – engagement with users	8/7/24
Haringey Cycling Club	Cycling	Presentation & Meeting	15/7/24
Haringey Welcome	Refugees & Asylum seekers	Meeting – round table discussion	17/07/24
Harris Academy	Young people	Presentation & Meeting	11/7/24
Mulberry Junction	Homeless Support	Presentation & Meeting	25/6/24
Mulberry Junction	Homeless Support	Engagement with users	8/7/24
Mulberry Junction	Homeless Support	Engagement with users	12/7/24
Mulberry Junction	Homeless Support	Engagement with users	22/7/24
Museum of Homelessness	homelessness	Meeting – round table discussion	17/07/24
Earlsmead Primary School	Young people	Presentation & Meeting	10/7/24
Public Health	Drug & Alcohol	Presentation & Meeting	
Public Voices	Resident & Community Engagement	Presentation & Meeting	22/7/24
Resettlement, Minorities and inclusion	Refugees & Asylum seekers	Presentation & Meeting	17/6/24
Streets Kitchen	Homelessness	Meeting – round table discussion	17/07/24
Streets Kitchen	Homelessness	Meeting with users on site	26/7/24
The Grove	Drug Support	Presentation & Meeting	7/5/24
The Outside Project	LGBTIQ+ Community Shelter, Centre and Domestic Abuse Refuge	Meeting – round table discussion	17/7/24
Tottenham Copwatch	Voluntary sector	Meeting – round table discussion	17/7/24
VCS Co-ordinator	Voluntary sector	Presentation & Meeting	22/7/24
Housing related Support Service	Homeless/rough sleeping Support	Presentation & Meeting	17/6/24
LCSP/BWNW	Residents	Presentation & Meeting	23/4/24
Friends of Markfield Park	Parks	Presentation & Meeting	4/6/24
Haringey NHW	Residents	Presentation & Meeting	9/5/24
Love Lane Estate event	Residents	Engagement with residents	16/5/24
Haringey ward panel	Police/Residents	Presentation & Meeting	28/5/24
South Tottenham ward panel	Police/Residents	Presentation & Meeting	5/6/24
Tottenham Central ward panel	Police/Residents	Presentation & Meeting	2/6/24
White Hart Lane Ward Panel	Police/Residents	Presentation & Meeting	17/7/24
Garden residents association	Residents	Presentation & Meeting	5/6/24
Kurdish Advice centre	BME - Kurdish	Meeting	30/5/24
SALB - Stella House, Altair close, The Lindales RA	Residents	Engagement with residents	5/6/24
Northumberland Park CHB	Police/Residents other stakeholders	Presentation & Meeting	17/4/24
PPSG	Stakeholders	Presentation & Meeting	3/4/24
Youth Service	Young people	Presentation & Meeting	10/7/24
Multi Faith Forum	Multi Faith	Presentation & Meeting	16/5/24

3b. Key Findings

1708 consultation questionnaires were completed, 56 completed in community settings. Respondents were asked, to what extent they supported a range of proposed prohibitions and outcomes of the survey are summarised below

Prohibition relating to	Strongly Agree/Agree	Neutral	Strongly disagree/disagree
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	Number	%	Number	%	Number	%
Alcohol Control	732	43	103	6	862	51
Drugs and drug paraphernalia	706	41	74	4	918	54
Causing harassment, alarm, or distress	819	48	83	5	794	47
Dogs defecating	984	58	83	5	630	37
Urinating in Public space	763	45	113	7	816	48
Defecating in Public space	868	51	78	5	749	44
Spitting in public space	705	42	146	9	845	49
Riding bicycle, moped, scooter or e-bike	765	45	94	6	834	50
Lighting fireworks in a public space	798	47	115	7	776	46

4. Data and Impact Analysis

This section considers how the proposed change will affect people with protected characteristics.

4a. Age

Data

Borough Profile¹

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

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

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had a detrimental impact on any age group.

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

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

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

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

Consultation findings

The highest response to the consultation survey came from age group 30-39 (25%). With the majority of respondent being between the ages of 22- 49 (58%). 22% of respondents were aged 50-74, and 2% of respondents being 75+ or under 21. The lowest response to the survey came from individuals under 17 at only 0.3%.

We recognise that the borough has a very young population and the findings relating to under 17-year-olds was statistically insignificant. Of the 5 young people who did respond to the survey all disagreed with the proposals. However, we did reach out to all schools and youth groups and met with two schools and youth service providers. The feedback from schools and the youth service providers we met with was that areas in and around schools and youth provision are often blighted with anti-social behaviour. The PSPO proposals were welcomed and thought necessary to provide a safer environment for school children and young people.

Additional comments to the survey contained a few comments relating directly to age:

- i. comments emphasising the impact that anti-social behaviour has upon the elderly community, the risk they experience on the streets and feeling unsafe. The PSPO proposals were supported as a means to provide a safer and cleaner environment.
- ii. Young people may not be confident to ride bikes on roads – we have amended this restriction adding the exemption of children.
- iii. Disagreement with the proposals with concerns raised that young black males would be targeted by the police and there would be increased stop and search against this group. The PSPO does not give the police any power to stop and search. There is no data to support that the PSPOs in the borough have ever been used to target young individuals.

Potential 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.

We have recognised some possible negative impacts with regard to the restriction relating to riding bicycles, mopeds and e-bikes on pavements and have amended the restrictions and included an exemption for children.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%²
 - 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 depression³
- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

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

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

- 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?

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had a detrimental impact on disabled people.

Consultation Findings

15% of the respondents of the survey stated they had a disability. Of these the following disabilities and conditions were selected: deaf or other hearing impairment (18), Learning difficulty (19), Long term condition/Hidden impairment (82), Mental health/mental distress issues (103), Neurodiverse (109), Physical impairment, (39), Visual impairment (14), Depression and anxiety (2)

A common concern raised in the consultation related to disabilities, particularly that people with mental health, neurodivergence or autism may struggle to adhere to the PSPO

² Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/disability)

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

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

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

restrictions and thus would detrimentally impact upon them, as highlighted in the comment below:

“Some people with certain mental health conditions or learning disabilities may act, unintentionally and without malice, in ways that may give members of the public some concerns. However, these people should not fall within the ambit of the regulations. In other words, the powers given to the police and other authorities must be exercised with care and sensitivity.”

A measured approach is adopted in enforcing PSPOs in the Borough. Engagement and warnings are always the first point of call, to point out the offence and work to dissuade the behaviour and understand the root cause, involving relevant services and partners to ensure an appropriate response. It is also recognised that some conditions are not always evident or visible, hence checks will be carried out with relevant services and through the engagement and warning process we will seek to identify any specific needs. Due care and sensitivity will be exercised and where possible assistance from appropriate support services utilised to address the situation and/or relay information about the PSPO restrictions in place. It is worth noting that Officers in the MPS do have body worn video and some enforcement officers also utilise this facility. Thus, a further mechanism for scrutiny. The enforcement of the PSPO has a due process around appeals, which can be instigated by an individual or someone else on their behalf.

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.

In Haringey mental health is a particularly concerning area of disability⁶.

- 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 reporting anti-social behaviour. Tackling anti-social behaviour through a borough-wide

⁶ [PowerPoint Presentation \(haringey.gov.uk\)](https://www.haringey.gov.uk/powerpoint-presentation)

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 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.⁷ The Council therefore promotes a joined-up approach with support services, as outlined above. 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, 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 addition, restrictions relating to urination and defecation in a public place will not be enforced against:

- (a) A person who is verified street homeless and/or
- (b) Any person who has a mental or physical condition, which would prevent them from being able to adhere to this restriction

We will ensure that details of the proposed the borough wide PSPO are shared with services and user groups linked to disabilities e.g. mental health, autism, learning disabilities. We will liaise with these groups to explore effective methods for communicating information about the PSPO and in the development of signage.

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.

4c. Gender Reassignment

Data Borough Profile⁸

⁷ [About Us](#) | [Mind in Haringey](#)

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

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

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

- 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.

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

- 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?

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had a detrimental impact based on gender reassignment.

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

According to 2021 Census 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 engagement with residents and investigation of anti-social behaviour 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.

Consultation findings

In the Consultation Survey Trans was identified as an umbrella term to describe people whose gender identity is not the same as, or does not sit comfortably with, the sex they were assigned at birth and 6% of all respondents to the Consultation Survey identified as Transgender. A high proportion of those respondents identifying as trans, disagreed, or strongly disagreed with the PSPO proposals. However, the additional comments provided by those in disagreement was not in respect of any detriment to being Trans but focussed on concerns relating to the impact on marginalised and vulnerable groups such as homeless and those with mental health and an opposition to giving police additional powers.

Potential 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 consumption, hence tackling this behaviour is likely to have a positive impact on this group.

4d. Marriage and Civil Partnership

Data

Borough Profile ⁹

- 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%)

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

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

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

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

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had a detrimental impact 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 Haringey¹⁰, 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%

Consultation findings

37% of respondents of the PSPO consultation stated that they were either married or co-habiting or in a civil partnership. 27% of respondents stated that they were single.

62% of respondents who identified as single either disagreed or strongly disagreed with alcohol restrictions. 27% of respondents who identified as co-habiting or married either disagreed or strongly disagreed with alcohol restrictions. Based on additional comments provided by those disagreeing or strongly disagreeing with restrictions, concerns were not in relation to any detriments owing to marriage and civil partnership, but concerns relating to the impact on marginalised and vulnerable groups such as homeless and those with mental health and an opposition to giving police additional powers.

Potential 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.

4e. Pregnancy and Maternity

- 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

¹⁰ [equalities_profile_of_haringey.pdf](#)

Borough Profile ¹¹

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.

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

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had a detrimental impact based on pregnancy and maternity. The measures are anticipated to ensure a safer and cleaner borough, which may particularly positively impact pregnant women or young mothers.

Consultation findings

1.2% of respondents were pregnant when completing the consultation survey and 1.5% had had a baby in the last 12 months. Based on additional comments provided by survey respondents no issues were raised relating to the proposed PSPO having any increased detriment for those who were pregnant or recently pregnant. Concerns were raised regarding the risk anti-social behaviour presents to families with children and children themselves, owing to areas feeling unsafe.

Potential 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.¹²

Data

Borough Profile ¹³

¹¹ Births by Borough (ONS)

¹² [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com/)

¹³ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/)

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%
- Other Mixed: 2.5%

White: 57.0% in total

- English/Welsh/Scottish/Northern 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.

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

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

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had a disproportional detrimental impact on any group based on race.

Haringey is the 5th 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 6th 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 proportions 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 distribution mirrors geographical locations of victims of hate crime. According to Metropolitan Police Service 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.

Consultation Findings

The consultation survey asked respondents to identify their national identity and ethnicity.

There was representation from a broad selection of national identities, with 31 national identities selected. 15% of respondents preferred not to identify their nationality or selected 'other' as their national identity was not listed as an option. It is acknowledged that many people identify as mixed heritage and selecting a single identity may not be possible. 43% of all respondents identified their national identity as 'British', this was the highest proportion of respondents under this categorisation. Furthermore, the highest proportion of survey respondents, 55%, identified their race as 'White'. Whilst there was representation from other ethnic groups this was considerably lower. Representation from 'Black' ethnic groups was particularly low given the borough profile. Nevertheless, concerns that the PSPO would be used to specifically target certain group, such as black and ethnic minorities was a recurring theme in the comments from respondents to the survey who disagreed or strongly disagreed with the proposed restrictions.

Potential Impacts

The impact of the policy on 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 categorisation 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 ethnicity¹⁴.

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*¹⁵.
- *Unfair Treatment: Concerns persist about unfair treatment of minorities in crime and policing*¹⁶.

The consultation generated concerns that the PSPO powers would be used to target ethnic minorities. However, there is no evidence to support that the enforcement of PSPOs within Haringey have 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.

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.

4g. Religion or belief

Data

Borough Profile ¹⁷

- Christian: 39%
- Buddhist: 0.9%
- Hindu: 1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%

¹⁴ [Understanding ethnic disparities in involvement in crime – a limited scope rapid evidence review, by Professor Clifford Stott et al - GOV.UK \(www.gov.uk\)](#)

¹⁵ [PolitiFact | Police violence is a leading cause of death for young Black men, but it doesn't top the list](#)

¹⁶ [Crime and policing - GOV.UK \(www.gov.uk\)](#)

¹⁷ Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

- Religion not stated: 8.0%
- Sikh: 0.3%

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

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

- 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%)

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.

Consultation findings

The highest proportion of respondents to the consultation survey identified as having no religion (23%) or being atheist (21%). 21% identified as Christian, but there was a poor level of response from other religious denominations.

The consultation had around 900 additional comments, where respondents could expand on the support or opposition to proposals. Whilst a couple of comments referenced religion or a particular faith, or reference hate crime owing to their faith, there were no concerns in relation to detriment to any particular religious group.

Potential Impacts

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

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have been disproportionately exercised on the basis of religion.

Hate crime can disproportionately impact people from religious communities. Hate crime and discrimination can include anti-social behaviour arising through alcohol hence tackling alcohol related anti-social behaviour 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 and cleaner environment.

4h. Sex

Data

Borough profile ¹⁸

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

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

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

- State of the Borough 2023

¹⁸ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityageandsexenglandandwales/2021)

- Strategic Needs Assessment 22-23
- Census 2021
- Residents survey 2021

Of the 264,000 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%¹⁹.

These concerns highlight the need for ongoing efforts to improve the safety for women and address issues related to violence against women and girls (VAWG). Reported fear of crime is higher amongst women than among men, i.e. the Haringey Residents Survey found that 19% of women felt unsafe when outside their local area after dark, compared to 10% of men.

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 community²⁰. The Borough wide PSPO addressing behaviour linked to alcohol and drug abuse which may give rise to behaviour causing harassment, alarm and distress, and other activities that make people feel unsafe and intimidated will further assist everyone, but women in particular, to feel safe in their community.

Consultation findings

700 respondents to the consultation survey identified as female, the highest proportion of respondents (41%). The response from individuals identifying as male was 32.5% and 1% identified as other.

The issue of female safety was raised by a number of respondents emphasising women and girls’ safety, as captured by the comment from the consultation below:

“I'd really like to a strongly enforced PSPO, particularly in parks and streets. For example, large groups of men drinking alcohol outside betting shops. The stretch where Lordship Lane meets Perth Road is particularly bad. Large groups of men, drinking alcohol, blocking the street and intimidating women and girls”

Potential Impacts

The intention of the PSPO 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.

¹⁹ [Haringey annual public health report 2023](#)

²⁰ [Improving safety for women and girls | Haringey Council](#)

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

4i. Sexual Orientation

Data

Borough profile ²¹

- 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.

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

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

Based on 2020 mid-year estimates²², as highlighted in an Equalities Review in 2021, 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.

Consultation findings

The vast majority of respondents to the consultation who stated their sexual orientation identified themselves as 'Heterosexual' (44%). 11% identified as 'Bisexual', which is much

²¹ Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/sexualorientationandgender/articles/sexualorientationenglandandwales/2021)

²² [equalities review june 21 0.pdf \(haringey.gov.uk\)](https://www.haringey.gov.uk/equalities-review-june-21-0.pdf)

higher than borough profile. Likewise, the percentage of respondents identifying as 'Gay' (3.8%) or 'Lesbian' (4%) was also higher than the borough profile percentages.

A couple of respondents raised concerns relating to risks of discrimination as they felt the police were homophobic and the enforcement of the PSPO would be detrimental to this group. We recognise that members of the LGBT community experience high levels of hate crime, and we acknowledge their concerns of inequitable services from the police. The council will be monitoring enforcement of the PSPO, this will enable us to identify if any particular group is disproportionately impacted and quickly address any such disproportionality.

Potential Impacts

Lesbian, gay, and bisexual people are more likely to experience hate crime. It is therefore likely that improving community safety through the enforcement of the PSPO may have a positive impact for this group.

Through monitoring the implementation and enforcement of the PSPOs, we will continue to identify and address any equality implications on the basis of sexual orientation.

We are not aware of any evidence to support that the implementation and enforcement of previous or current PSPOs in Haringey, have had disproportional detrimental impact on any group on the basis of sexual orientation.

4j. Socioeconomic Status

Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023²³
- 19.6% of residents were claiming Universal Credit as of March 2023²⁴
- 29.3% of jobs in Haringey are paid below the London Living Wage²⁵

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)²⁶
- 3.7% of Haringey's working age population had no qualifications as of 2021²⁷

²³ ONS – [ONS Claimant Count](#)

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

²⁵ 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](#)

²⁶ DfE – [GCSE attainment and progress 8 scores](#)

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

- 5.0% were qualified to level one only²⁸

Area Deprivation

Haringey is the 4th 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.²⁹

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

The following data sources have been used to inform the assessment of the impact of the proposal on people with protected characteristics:

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

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.

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.

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

²⁹ IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

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 behaviour³⁰ and are currently being explored and incorporated into the Borough Community Safety Strategy.

Consultation Findings

Additional comments provided in the consultation highlighted the issues of poverty and how on the spot fines would cause further deprivation or result in criminalisation of individuals unable to pay such fines. The enforcement of the PSPO within the borough has never incorporated on the spot fines. Whilst breaches can be enforced by the issuing of a fixed penalty notice (FPN) by the Police and the Council, the FPN would be processed for payment by the Council only. This would involve the assessment of the FPN by the Council to ensure it was appropriately issued and any appeal against the FPN would also be managed by the Council. This enables the Council to monitor the enforcement of the PSPO, ensuring that mitigating circumstances are taken into consideration and that no particular group is being disproportionately impacted.

Potential 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 safeguarding. A Public Sector Equality Duty Assessment is completed for all prosecution cases, 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.

5b. Intersectionality

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

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

We recognise that there was poor representation from certain groups during the consultation, namely young people, black and ethnic minority groups and religious groups and people with disabilities. We will continue work with relevant organisations and groups to review the impact of the PSPO.

We will involve relevant groups and stakeholders in publicising the PSPO, engaging with relevant groups to ensure publicity and signage is appropriate and accessible. We will regularly review the impact of PSPOs to assist us in identifying any unfairness in the application of the PSPO and enable us to take any necessary measures to address any identified unfairness.

The measured approach to enforcing the PSPO will enable a continued dialogue with a range of support services to assist with identifying any negative impacts and necessary reviews or amendments in the future.

6. Overall impact of the policy for the Public Sector Equality Duty

The consultation process for this PSPO has involved liaison with a wide range of groups and services, increasing our knowledge and understanding of different groups. We will continue to build on these partnerships whilst implementing the PSPO.

This engagement will help build trust and foster positive relationships between different community members

By setting clear standards for behaviour in public spaces, the PSPO will encourage respectful interactions among all community members, which can help reduce prejudice and promote understanding between different groups.

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.

The council recognises that a person who is verified street homeless and/or a person who has a mental or physical condition, may struggle to adhere to the restrictions relating to urinating and defecating in a public space, and therefore this prohibition will not be enforced against these groups.

The PSPOs are likely to have a positive impact on all regardless of any held protected characteristic. We recognise that vulnerable groups such as those who are street homeless and certain member of some protected characteristic groups, such as those with disabilities, ethnic minorities and LGBT community experience high levels of crime and discrimination. The proposed PSPO aims to create safer and cleaner environments, ensuring that public spaces are accessible and inclusive for all. This can help reduce discrimination and promote equality.

Enforcement Officers will continue to operate a holistic approach when monitoring and enforcing a PSPO. Support and intervention will initially be undertaken where any vulnerabilities or disabilities are identified, 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.

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.

By implementing these measures, councils can better address any disproportionality against any protected groups or any intersectional impacts of PSPOs and promote a more inclusive and equitable approach to public space management.

7. Amendments and mitigations

7a. 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**

There have been some major changes to the proposal. Some restrictions have been removed from the proposed order initially consulted on. This was owing to the consultation responses and a further assessment of those restrictions in terms of their viability and the availability of other measures to manage those behaviours. These changes were not owing to any identified inequalities or negative impacts that the Council were unable to mitigate.

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**

There have been some adjustments to the proposal to remove barriers or better promote equality. These adjustments relate to exemptions with regard to particular restrictions:

- Restrictions with regard to urinating and defecating will remain part of the Borough-wide PSPO proposal, making clear exemptions of anyone who is verified street homeless and/or any person who has a mental or physical condition, which would prevent them from being able to adhere to this restriction, as they would have a reasonable excuse.
- Clarifying that the restriction relating to riding a bicycle, moped, e-scooter or e-bike applies to pavements or footpaths, in the restricted area and when riding in a dangerous or reckless manner, that is likely to cause

obstruction, alarm, distress or annoyance to members of the public or cause criminal damage by their use, commits an offence.

- Specifying exemptions to the above restrictions as: Any electrically powered scooter designed for people with restricted mobility, including those who are elderly or disabled person, children and that discretion will be used if cyclists lack confidence to ride on the road or are intimidated by traffic.

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:

The Local Authority has taken into consideration the comments from the consultation and made appropriate amendments. If through monitoring and liaison with other services and stakeholders we are made aware of any potential negative impacts, we will address this via the appropriate channels via the governance structure.

Lead officer: **Joan Appavoo**

Timescale: Quarterly

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

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

The PSPO enforcement will be reviewed quarterly through data available and feedback from services/stakeholders, complaints, or other feedback mechanisms.

Date of EQIA monitoring review:

January 2025

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Eubert Malcolm

Date

11 October 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.