

Equality Impact Assessment

Name of Project	PSPO – St Ann’s & Tottenham Green Wards	Cabinet meeting date If applicable	Cabinet Member Signing – 15 th July 2016
Service area responsible	Community Safety & Regulatory Services		
Name of completing officer	Joan Appavoo	Date EqIA created	2 June 2016
Approved by Director / Assistant Director	Eubert Malcolm on behalf of Stephen McDonnell	Date of approval	7 th July 2016

The Equality Act 2010 places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to:

- **Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act**
- **Advancing equality of opportunity between those with ‘protected characteristics’ and those without them**
- **Fostering good relations between those with ‘protected characteristics’ and those without them.**

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a ‘**Specific Duty**’ to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council’s website.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead	5. Joan Appavoo
2. Equalities / HR	6. William Shanks
3. Legal Advisor (where necessary)	7.
4. Trade union	8. n/a

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

The Council is looking to introduce a Public Spaces Protection Order (PSPO) in a defined area of South Tottenham straddling St Ann's Ward and Tottenham Green Ward, which will restrict the activities listed:

- Congregating in a group of two or more persons in such a manner as to cause obstruction or give reasonable grounds for annoyance to any person in the street or public place or the car park of Wickes Store
- Persistently loitering in a street or public place or the car park of Wickes Store
- For a person in the street, public place or Wickes Car park, including a person in a motor vehicle to solicit another for the purpose of obtaining casual labour
- Urinating, defecating or exposing genitals in a public place or in an area belonging to a private resident, business or the council (excluding a toilet designated for use by members of the public).
- Consuming alcohol or having an open container of alcohol in your possession in the street or public place or the Wickes Car Park.
- Consuming alcohol or having an open container of alcohol in your possession in the street or public place or the Wickes Car Park.
- Gating an area that is blighted with drug taking resulting in defecation of alleyways.

The government guidance on PSPO states that the restrictions of a PSPO can be blanket restrictions or requirements or can be targeted against certain behaviours by certain groups at certain times. At the onset of our consideration of the PSPO it was noted that such an order is likely to have a more significant impact upon the activities of the Eastern European men regularly loitering around the Wickes Store, in Seven Sisters Road, waiting for or having been unsuccessful in securing any paid labour. These are the individuals largely identified as but not solely responsible for the anti-social behaviour that is detrimental to the local community's quality of life – with instances of men urinating or defecating into people's gardens, litter from consumed cans and bottles of alcohol, intimidation felt by the large numbers blocking the public highway, the noise nuisance through the men gathering together and drinking.

The introduction of a PSPO in the locality of Wickes Store, Seven Sisters Road N15 has the potential to have a positive impact on the Council's duty under the Equality Act 2010 to foster good relations between communities. It will tackle antisocial behaviour which has the potential to

create tensions between different communities. The PSPO will apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

A Consultation was carried out seeking the views of all local communities and ensured that the characteristics of respondents were recorded. An EIA can hence be completed utilising the data obtained

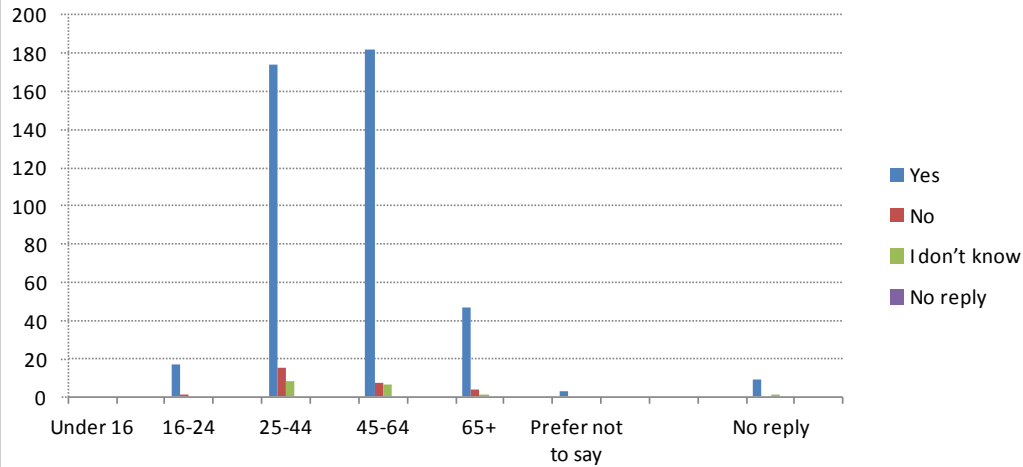
Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment
Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council’s workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
<p>The PSPO is likely to have a positive impact on any staff working in the locality. Staff based at Apex House (Seven Sisters Road) and other housing staff were advised of the Consultation and several staff did complete the questionnaire. The verbal feedback indicated a 100% support for the PSPO with additional requests that the PSPO be extended to actually include Apex House (Seven Sisters Road) and Stonebridge estate.</p>	<p>The consultation data did ask respondents to specify if they are a resident, local business or work in the area. 12% of respondents selected the ‘work in the area’ category, but this did not differentiate between general public and council staff. There was again an overwhelming support for the PSPO, the only significant disagreement was with regard to the boundaries where Respondents advocated extending the existing boundary to cover a larger area.</p>

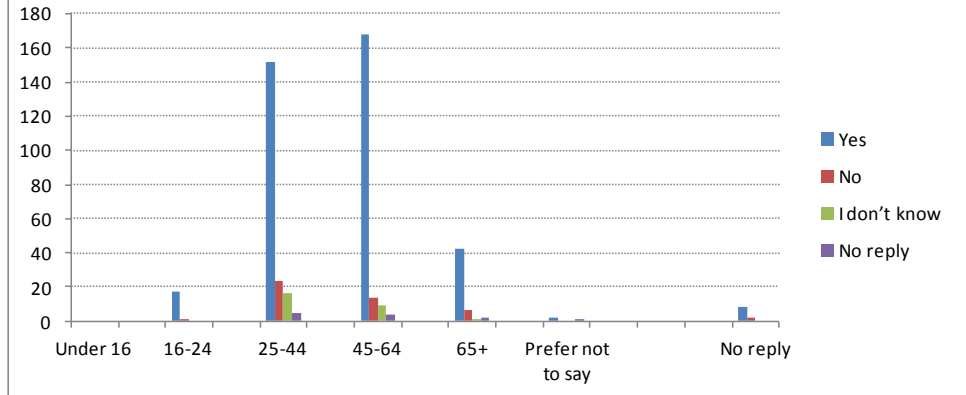
Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment
This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
<p>Results of PSPO Consultation carried out between 22nd February 2016 to 18th April 2016</p>	<ul style="list-style-type: none"> • Public view of the PSPO proposals 91% of respondents agreed with the PSPO restricting defined activities; 82% of respondents agreed with the PSPO boundary; 77% of respondents agreed with the gating of the alleyway between Roslyn Road and Southey Road. • Differentiates between those living, working or studying in the affected area and those that do not; • Characteristics of the Respondents: Gender, age, disability, sexual orientation, gender reassignment, religion & belief, race, marriage & civil partnership, pregnancy & maternity. <p>A breakdown of the characteristics is outlined in Final Consultation Report and through the charts below</p>

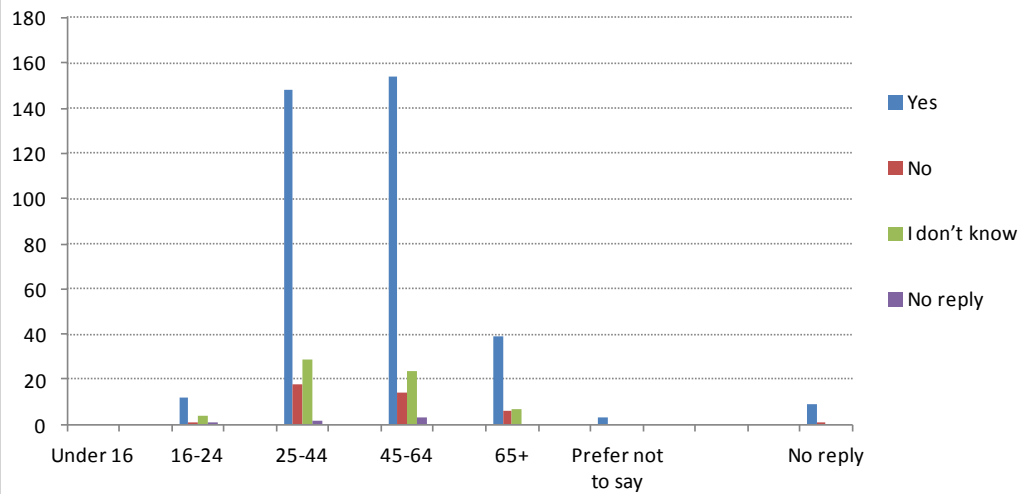
Q2a. Do you agree with the PSPO restricting these activities? - by Age



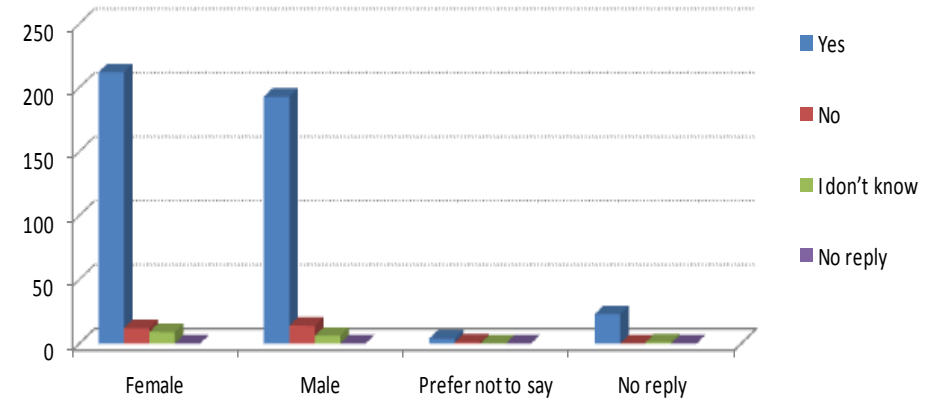
Q3a. Do you agree with the PSPO boundary area? - by Age



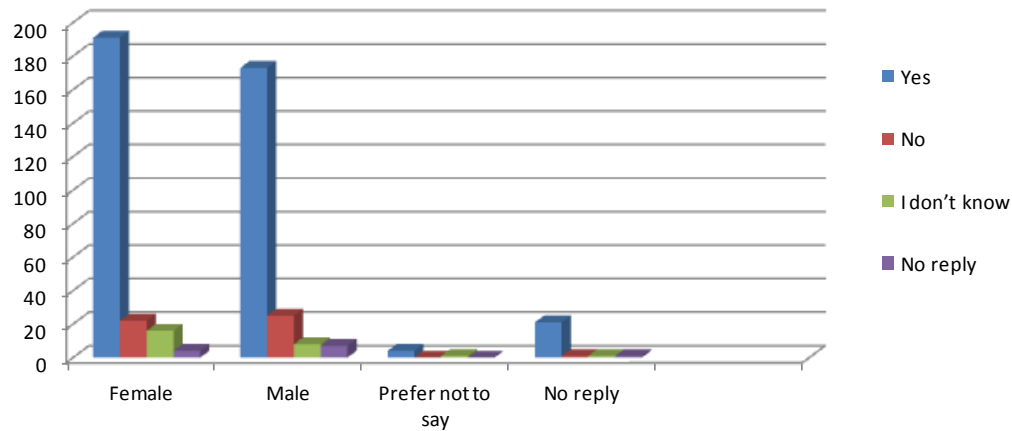
Q4a. Do you agree with the proposed gating of the alleyway? - by Age



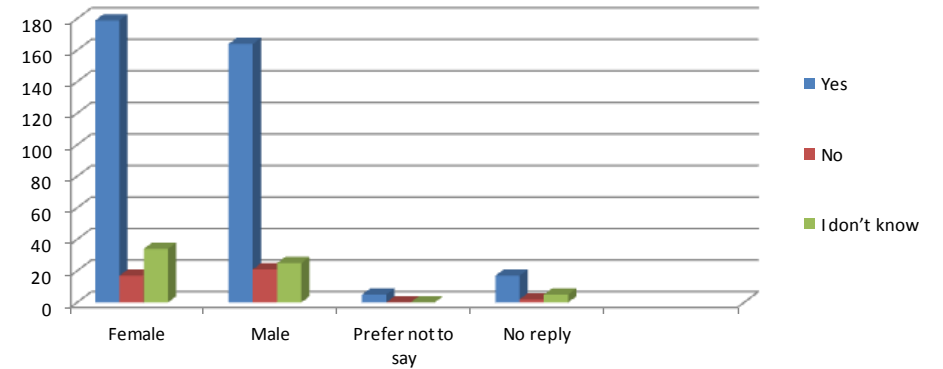
Q2a. Do you agree with the PSPO restricting these activities? - by Gender



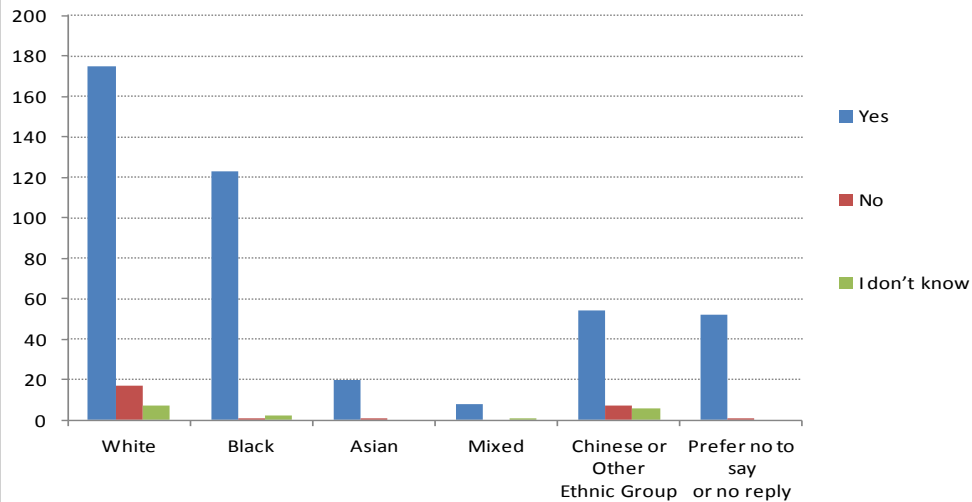
Q3a. Do you agree with the proposed PSPO boundary area? - by Gender



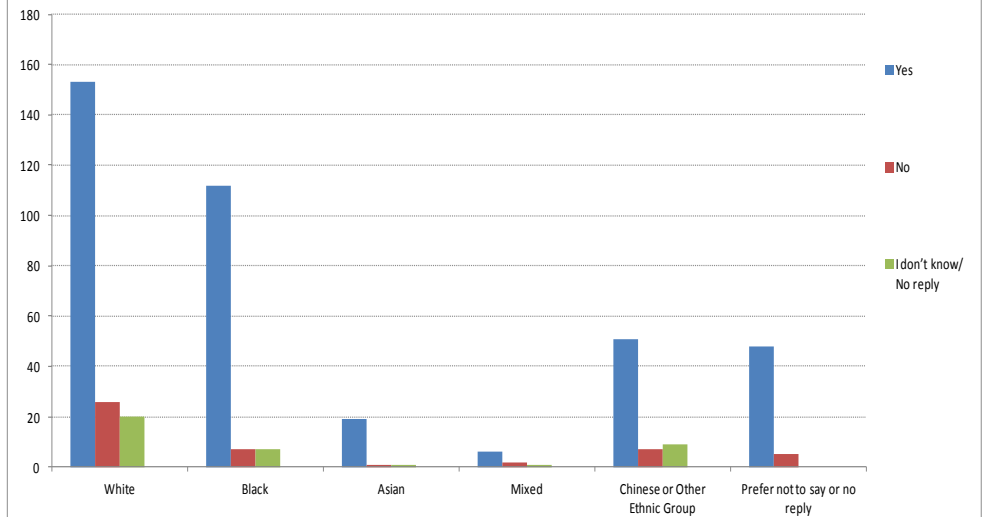
Q4a. Do you agree with the proposed gating of the alleyway between Roslyn Road and Southey Road? by Gender



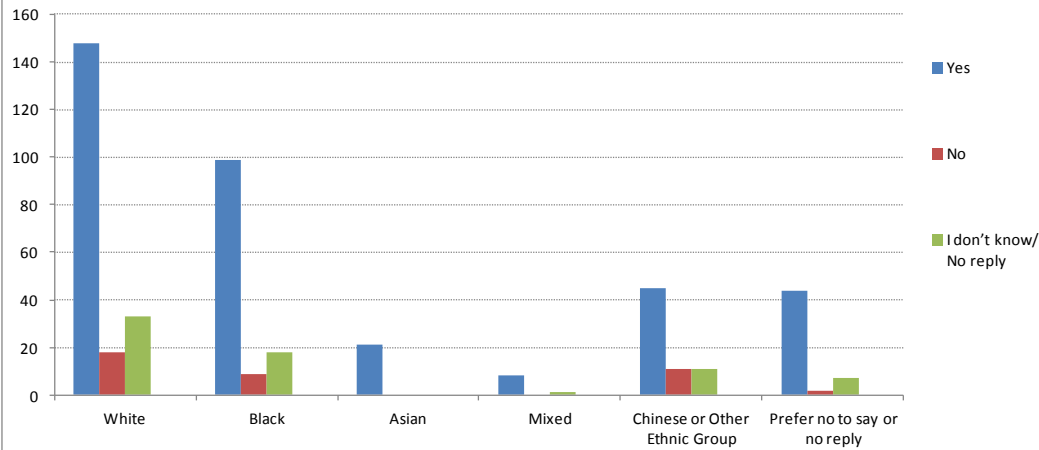
Q2a. Do you agree with the PSPO restricting these activities? - By Ethnicity



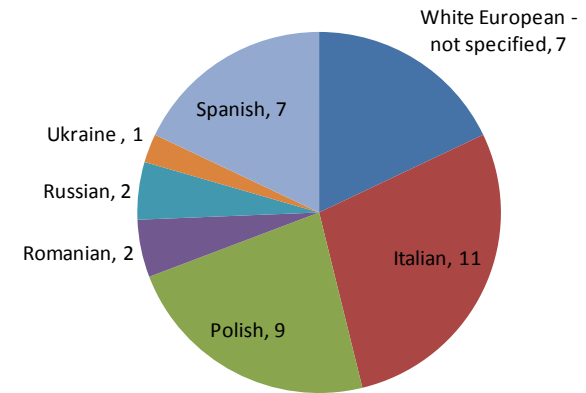
Q3a. Do you agree with the proposed PSPO boundary area? - by Ethnicity



**Q4a. Do you agree with the proposed gating of the alleyway? -
by Ethnicity**








Other White European Breakdown







Individuals of 'other white european' ethnic origin like other ethnic groups overwhelmingly supported all aspects of the PSPO. Within this group no one disagreed with the proposed restricted activities. 1 person of Polish origin disagreed with the proposed boundary. 3 people (Italian, Polish and a Romanian disagreed with the proposed gating of the alleyway.

**Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:
Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
Sex			Of the men and women who responded to the questionnaire 91% were in favour of the PSPO criteria, 81% were in favour of the boundary and 76% were in favour of the gating order. Both men and women spoke of the intimidation felt and supported this action as a means to increase safety in the area	
Gender Reassignment			Of the 475 respondents 373 ticked no change in gender from birth and 97 made no reply. Only 3 indicated a change in their gender. Of these 3 all were in favour of the PSPO restricting activities and the boundary; 1 was in favour of the gating order, 1 against and 1 ticked don't know	
Age			The vast majority of all age groups were in favour of the PSPO restricting activities, its boundary and the gating order. Increased journey with shopping was an issued raised by some residents and of course this may present problems for the elderly and frail	

Disability			<p>Only 12.5% of Respondents to the Consultation indicated that they had a physical or mental disability.72.5% indicated that they did not and 15% either selecting 'prefer not to say' or leaving section blank. Of those specifying a mental or physical disability, 93% agreed with the restricted activities of the proposed PSPO, 85% agreed with the proposed boundary area and 80% agreed with the gating of the alleyway.</p>	
Race & Ethnicity			<p>The vast majority of all ethnic groups were in favour of the PSPO restricting activities, its boundary and the gating order. The PSPO would have a significant impact on the Eastern European Men loitering outside Wicks; they declined to complete any questionnaires but gave verbal acknowledgement of why such action was needed to address ASB. It is also noted that of 156 respondents who ticked 'any other background' 14 were of Eastern European origin and again very much in favour of the proposals</p>	

Sexual Orientation			The vast majority of those identifying their sexual orientation in the questionnaire were in favour of the PSPO restricting activities, its boundary and the gating order. 6 respondents identified themselves as bi-sexual and in their case there was no majority vote for the PSPO boundary and gating order.	
Religion or Belief (or No Belief)			The vast majority of of all religious groups or beliefs were in favour of the PSPO. The restricting activities, its boundary and the gating order. There were no identified impacts on any particular religious group, faith or belief	
Pregnancy & Maternity			Only 4 respondents stated they were pregnant; 4 were in favour of the whole proposal and 1 did not agree with the restricted activites and ansewered don't know in relation to the boundary and gating. Only 6 respondents indicated that they had had a baby within the last 12 months, none of whom opposed any part of the proposed PSPO. A high proportion of respondents often left the questions relating to pregnancy blank.	

Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			There were no distinct patterns between responses and marital status. The vast majority of all groups favoured the PSPO proposals.	
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Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex				The PSPO is only likely to have a positive impact on staff – by using the PSPO to prevent ASB and tackle any persistent ASB the area will be improved and made a safer and cleaner working environment
Gender Reassignment				
Age				
Disability				
Race & Ethnicity				
Sexual Orientation				
Religion or Belief (or No Belief)				
Pregnancy & Maternity				
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))				

Stage 6 - Initial Impact analysis

Actions to mitigate, advance equality or fill gaps in information

It is likely that the PSPO will have a significant positive impact for all people living and working in the affected area. The increased power to the Council and Police to tackle ASB in the locality is likely to improve the areas in terms of improving the environment, reduce fear of crime and increase safety of residents and workers, thus improving their quality of life and community as a whole.

There is likely to be a negative impact upon the Eastern European men who tend to loiter outside Wickes waiting for work, as a group. In so far as the PSPO will restrict them from loitering in the area, which will then in turn impact on them seeking employment in this informal manner in the area.

The consultation engaged with as many of the people living and working in the area as possible; this incorporated reaching a wide range of people. The consultation questionnaire was available on-line in other languages.

The consultation undertook direct consultation with this group to obtain their views and concerns. Romanian/Hungarian and Turkish speaking officers were on site outside Wickes from the early hours of the morning to maximise contact. The Romanian/Hungarian speaker was a worker from Thamesreach who was familiar with needs and culture of the men seeking work. He was able to engage with them, explain the PSPO and their rights. All men spoken to stated an understanding as to why the Council were taking this action. About 40 men were spoken to, of Bulgarian, Romanian and Hungarian origin. All acknowledged that there were ASB issues linked to the men hanging about outside Wickes (albeit each group blaming the other for causing the ASB). Prior to the implementation of the PSPO the Council and its partners have agreed that further engagement will be undertaken with this group: translated leaflets and interpreters will be used to fully relay the terms of the PSPO and repercussions of breaching the order; utilising the Thames Reach TRIO (Targetted Rapid Intervention Outreach) to again engage with advice on rights, appropriate & legal employment paths and options available.

As can be seen in the Consultation Report a wide range of additional comments were made. Some comments were made stating that the Proposed PSPO and its provisions were racist, seeking to criminalise a particular group. Though such comments were repeated in the various addition comment boxes of the questionnaire the source was from a handful of people; they were not from the same ethnic group and there were no patterns in respect of other characteristics. The

	<p>PSPO will be implemented without discrimination and proportionately, the concerns of all respondents will be taken on board and hopefully be addressed through the monitoring of the implementation and reviews. At the end of the first year of the PSPO, the actions and effectiveness will be evaluated to inform any proposal to extend the PSPO for a further period of time.</p>
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Stage 7 - Consultation and follow up data from actions set above

Data Source (include link where published)	What does this data include?
<p>Results of the Public Consultation undertaken between 22 February 2016 and 18th April 2016</p>	<p>See copy of Consultation Report (Appendix 4)</p>

Stage 8 - Final impact analysis

There were 475 questionnaires completed in response to the Public consultation. We are advised by the Communications team that this was a great response from the East of the Borough as it is usually hard to engage with. The respondents were diverse, reflecting all ethnic groups and other protected characteristics. Additional efforts were made to ensure engagement with the group which is most likely to be adversely affected by the introduction of the PSPO in the locality, namely the Eastern European Men loitering outside Wickes and the immediate streets.

The introduction of the PSPO will impact on the lives of people who live, work and visit the area of the PSPO. The proposed restrictions will impact positively on people whose protective characteristics are impacted upon by the anti-social behaviour the order is designed to address. For example, women feeling intimidated and harassed by the groups loitering on the streets, blocking pavements. The aim is for the PSPO to deter people from engaging in the restricted activities. Whilst the PSPO is designed to prohibit certain activities it is also designed to enable people to feel that the place where they live, work or visit, is a safe and welcoming place. The PSPO tackling ASB in the area could therefore have a positive impact for the area.

Upon implementation, the PSPO will be applied to everyone within the designated area without discrimination of any kind. The authorised officers who will be monitoring the area and enforcing the PSPO will consider the needs of the individual and their personal circumstances in order to make an informed decision as to the appropriate action to take, they will also ensure that any action taken is proportionate to and balanced against the risks posed, either to an individual or the wider community. e.g. seriousness of offence, any past history, repeated non-compliance.

The net outcome of the consultation was an overwhelming support for the PSPO – During the consultation process many people spoke of the intimidation and feeling unsafe, generally commenting that ‘it was about time’ something was done. Women in particular felt apprehensive when walking passed Wickes, having been subject to sexual harassment. Others commented on the drinking in the street and the debris left behind – cans of beer and puddles of urine in their front yards. However it is noted that upon completing the Consultation questionnaire it tended to be the very few people opposing the PSPO who would make additional comments. The only variance which received a high proportion of support was that the boundary of the designated area should be extended to include the Stonebridge Estate and follow natural boundaries; the PSPO has subsequently been amended to reflect this. Generally most people felt that the proposed action should have been taken a long time ago and/or that many other areas could benefit from similar enforcement measures.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Eubert Malcolm on behalf of
Stephen McDonnell

Date of review

7th July 2016

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.