

EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for 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.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Public Spaces Protection Order Love Lane Estate
Service area	Enforcement Services
Officer completing assessment	Joan Appavoo
Equalities/ HR Advisor	Luke Rigg/Hugh Smith
Cabinet meeting date (if applicable)	22 January 2019
Director/Assistant Director	Stephen McDonnell

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

The proposal:

The Council is looking to introduce a Public Spaces Protection Order (PSPO) on the Love Lane estate in Northumberland Park Ward, which restricts the activities listed below:

- A person not legally resident on the estate is prohibited from entering blocks on the estate unless visiting a named legal resident or engaging in work
- A person is prohibited from taking part in any sexual acts in any public place within the boundary of the area marked red on the map
- A person is prohibited from soliciting another for the purpose of obtaining sex or drugs
- It is prohibited for any person to ingest, inhale, inject, smoke, possess or otherwise use intoxicating substances *
- It is prohibited for any person to possess, sell or supply intoxicating substances*
- It is prohibited for any person to urinate, defecate or expose genitalia in a public place or in an area designated for use by members of the public
- A person is prohibited from entering the play area unless supervising or accompanying a child/ children).
- Persons other than those resident on the estate may only access the estate to visit a legal resident, to engage in legitimate work on the estate, to pass through the estate or to access the doctor's surgery (Tottenham Health Centre) at 759 High Road, London N17.
- No person shall loiter on the estate when not visiting a named person legally resident on the estate

The introduction of a PSPO will assist the Council and the police to tackle anti-social behaviour; resulting in a reduction in individuals engaging in anti-social behaviour. Such behaviour is often to the detriment of local residents and has the potential to create tensions between different communities.

The key stakeholders who may be affected by the proposal:

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. This PSPO may have a significant impact upon the activities of Eastern European men and women. Several individuals of Eastern European origin have been identified in the past as engaging in, but not solely responsible for, the anti-social behaviour that is having a detrimental effect on the community's quality of life. However, it is noted that in the last six months the presence of individuals of Eastern European origin engaging in ASB in the affected area has significantly diminished, though ASB and

crime remains at a significant level of concern.

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

The decision-making route:

A decision was taken on 8 November 2017 to go out to public consultation on a proposed PSPO in the Love Lane estate. The Council's consulted with the public between 14 February and 11 April 2018. The findings of the public consultation inform the final Cabinet Report and EqIA, which will go to 11 December 2018 Cabinet.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	2011 Census, public Consultation findings, locally held data	N/A
Gender Reassignment	2011 Census, locally held data	N/A
Age	2011 Census, public Consultation findings, locally held data	N/A
Disability	ONS Disability in England and Wales, 2011 Locally held data	N/A
Race & Ethnicity	2011 Census, public Consultation findings, locally held data	N/A
Sexual Orientation	ONS Sub-National Sexual Identity Data, 2013-15, Locally held data	N/A
Religion or Belief (or No Belief)	2011 Census, Locally held data	N/A
Pregnancy & Maternity	2011 Census, Locally held data	N/A
Marriage and Civil Partnership	2011 Census, Locally held data	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How do this compare with wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

This section will include

- Demographics of Northumberland Park Ward
- 2011 Census Data
- Local data provided by Regeneration Team

It is noted that some of the individuals who may breach the terms of the proposed PSPO and be negatively impacted by the Order's powers do not live in the estate or the Northumberland Park ward. By the nature of their transience, it is extremely difficult for the Council to record data on these individuals and therefore the Council draws on, to some extent, the anecdotal experience from working with them in the estate.

1. Sex

There is broadly the same proportion of men (49.8%) and women (50.2%) in the Northumberland Park ward as the whole borough (49.5/50.5%).

On the Love Lane Estate:

- 53% of secure council tenants are female and 47% are male, which is roughly representative of the population of the ward.
- For resident leaseholders, 29% are female, 12% are male and 59% are unknown.
- The estate-wide split is 68.3% female and 31.3% male
- Among leaseholders 24.1% female, 61.4% male and 14.5% unknown.
- In TA, women tend to be more vulnerable to becoming homeless and are therefore more likely to use TA.
- There are 11 known single parents amongst secure tenants and leaseholders, who are likely to be women as women are 87% of heads of single parent households. This is also likely to be the case amongst temporary accommodation tenancies as there are a disproportionate number of single parent households in Northumberland Park, and this is likely to be represented on the Love Lane Estate.

2. Gender Reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic. The Equality and Human Rights Commission estimate that there is between 300,000 and 500,000 transgender people in the UK¹.

At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to live in the Love Lane estate or breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

3. Age

Northumberland Park has the second highest proportion of 0-19 year olds in the borough,

¹ <https://equalityhumanrights.com/en/publication-download/research-report-27-trans-research-review>

and with a particularly high number of 0-4 year olds. Compared to the wider population, Northumberland Park has the second lowest proportion of 20-64 year olds and third lowest 65+ year olds. Therefore, it is considered that the proposed PSPO will have a disproportionate impact on children and young people aged 0-19.

Table 1.3(a) - Age profile by tenure on Love Lane Estate

age range	secure council		resident leaseholders		HRW output areas		Northumberland Park ward	
	total	%	total	%	total	%	total	%
0-4	no data	0.0%	no data	0.0%	22	10.3%	1,333	9.2%
5-7	no data	0.0%	no data	0.0%	12	5.6%	752	5.2%
8-9	no data	0.0%	no data	0.0%	5	2.3%	448	3.1%
10-14	no data	0.0%	no data	0.0%	8	3.7%	1,127	7.8%
15	no data	0.0%	no data	0.0%	1	0.5%	242	1.7%
16-17	no data	0.0%	no data	0.0%	0	0%	431	3%
18-19	no data	0.0%	no data	0.0%	9	4.2%	393	2.7%
20-24	no data	0.0%	no data	0.0%	24	11.2%	993	6.9%
25-29	3	4.3%	0	0.0%	17	7.9%	1,166	8.1%
30-34	3	4.3%	2	5.9%	50	23.4%	3,604	25%
35-39	3	4.3%	1	2.9%				
40-44	12	17.1%	2	5.9%				
45-49	8	11.4%	0	0.0%				
50-54	14	20.0%	1	2.9%	41	19.2%	2,344	16.2%
55-59	5	7.1%	3	8.8%				
60-64	6	8.6%	2	5.9%				
65-69	4	5.7%	2	5.9%	15	7%	650	4.5%
70-74	4	5.7%	0	0.0%				
75-79	6	8.6%	0	0.0%	3	1.4%	375	2.6%
80-84	2	2.9%	0	0.0%				
85-89	0	0.0%	1	2.9%				
90+	0	0.0%	0	0.0%	0	0%	48	0.3%
Unknown	0	0.0%	20	58.8%	0	0.0%	0	0.0%
Grand Total	70	100.00%	34	100.00%	214	100.00%	14429	100.00%

This data does not represent children and young people for Love Lane residents up to the age of 19 years old because they do not hold the tenancies themselves. However, we expect a large proportion of the 20-64-year old age groups to have children because, as outlined above, Northumberland Park has a comparatively younger population. In addition to this, there is a disproportionate number of female-headed lone parent families.

The Council does not hold information relating to the age of leaseholders, but we expect them to be older, because they have had more opportunities to purchase properties and obtain private financial support in doing so. The Council will mitigate the impact of acquiring resident leaseholders' homes with the measures outlines above.

4. Disability

Table 1.4 – Disability breakdown by ward, borough, region and country

Activity level	Northumberland Park	Haringey	London	England & Wales
Day-to-day activity limited a lot	8.1%	6.8%	6.7%	8.3%
Day-to-day activity limited a little	8.6%	7.2%	7.4%	9.3%
Day-to-day activity not limited	83.3%	86.0%	85.8%	82.4%

Northumberland Park has proportionately more residents who have impairments that impact on their ability to do day-to-day tasks. In particular, the ward has the highest proportion of residents in Haringey who have impairments, which limit their abilities to do day-to-day tasks a little. We are not able to determine the types of disability from this data, but will need to consider the impact of the proposed PSPO on residents who share this protected characteristic.

5. Race/Ethnicity

Northumberland Park has a lower proportion of residents who define themselves as White British (17%), compared to Haringey (35%), London (45%) and the national average (80%). There are 20.73% defined as “White Other”, which is likely to include East European communities. This is lower than the Haringey average of 22.97% but significantly more than the London (13%) and national average (4.5%). It is likely that this population has also grown since the 2011 census. Based on feedback from Rehousing Officers a large Turkish-speaking population has also been identified and during the consultation, specific surgeries were set up for Turkish speakers.

There are also significant Black African (22%), and Caribbean (13.5%) communities in the ward. This is compared to the borough, London and the national averages. Therefore, it is anticipated that the proposed PSPO will impact on these communities disproportionately.

6. Sexual Orientation

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the census. However, the ONS estimates that 3.7% of Haringey’s population is lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country².

7. Religion

Northumberland Park has a comparatively high proportion of Christians (50.6%), higher than Haringey (45%) and London (48%). There is also a larger Muslim population (24%) than the rest of Haringey (14%), London (12%) and national averages (5%). It is not anticipated that the proposed PSPO will directly impact on people or groups who share this protected characteristic.

For all Love Lane Council tenants, which include TA residents, 9.1% are Christian, 5.3% are Muslim, but for 79.8% their religion is not known.

²

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

8. Pregnancy and maternity

Haringey has a higher birth rate compared to London and England. As Northumberland Park has the second highest number of 0-4 year olds in the borough, it is likely that the birth rate is disproportionately higher in Northumberland Park.

9. Marriage and civil partnership

In 2011, there were 10 couples in a civil partnership in Northumberland Park. This is compared to 1,651 marriages (which was only available to heterosexual couples at the time). Of the secure Council tenants and resident leaseholders on Love Lane estate, there were no tenants in a civil partnership from 2017 data collection. Should it be established that there are any tenants in a civil partnership, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

Other relevant information

The estate hosts three tower blocks (Charles House, Moselle House and Ermine House) and a few properties on Whitehall Street. The permanent tenants of all three tower blocks have been decanted and these properties are currently being used as 'Temporary Accommodation'. The Council is aware that this accommodation is overrepresented by households with young children.

The proposal to introduce a PSPO in the Love Lane estate will negatively impact the individuals and groups who breach the terms of the proposed PSPO. Through the ongoing work to support the residents of the Love Lane estate and to reduce Anti-Social Behaviour (ASB), the Council has identified that particular protected characteristics are overrepresented among the individuals and groups who commit ASB and are therefore more likely to be negatively impacted by the proposed PSPO. Although the proposed PSPO is no longer prohibiting rough sleeping, it is likely that some of the specific behaviours and activities that are prohibited owing to the detrimental effect on the community's quality of life, will involve rough sleepers.

In comparison with other estates in the borough, the Love Lane estate has had a significant number of rough sleepers and the majority of these have been EEA Nationals. Therefore, the Council has identified that the group who may be disproportionately affected by the proposed PSPO is men and women of Eastern European ethnicity.

However, there has been a reduction in the presence of Eastern European Individuals and rough sleepers in the last 6 months, which mitigates the number of individuals who may be directly affected by the proposed PSPO.

4. a) 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?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

The Council conducted a consultation with the residents of the Love Lane estate between 14th February 2018 and 11th April 2018. A total of 85 responses to the consultation were received. This represents a 17% response rate. The Council engaged extensively with the residents on the estate and organised a number of outreach activities to maximise participation in the consultation. The Council has experienced significant challenges with reaching a high number of people in an area, which is currently very transient.

Consultation Activity:

- an online questionnaire
- 500 Hard copies of the Consultation Questionnaire with accompanying explanatory note, were initially hand delivered to all residential properties within the affected area
- A follow-up door knocking exercise to all residential properties and businesses in the affected area, to enable direct face-to face contact with stakeholders
- Contact with Tottenham Hotspur Football Club, British Rail and other relevant stakeholders within the locality
- Liaison with Regeneration Team to set up, publicise and facilitate daytime and evening surgeries; some offered with Turkish speakers.
- In addition, local ward councillors were advised and encouraged to share information about the consultation with their constituents.

4. b) 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

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The consultation asked respondents to specify the name of the road they live or work in. 98% of the respondents lived or worked within the affected PSPO area.

Headline Findings:

- 91.8% (78) Agreed that the terms of the proposed public spaces protection order are clear. 7% either said no or did not know.
- 95.3% (81) Agreed with PSPO proposals to tackle drug dealing, crime, prostitution and anti-social behaviour. 1% said no and 3% did not know.
- 76% (76) Agreed with the proposed PSPO boundary area. 6% said no and 3% held other views

Sex

64.7% of respondents were male and 35.3% were female. 100% of male and 93% of

female respondents were in favour of the proposal.

Age

Almost half (49.4%) of respondents were aged 25-44. Over a third (36.5%) were aged 45-64 and less than 10% were aged under 25 (4.7%) or over 65 (9.4%).

The vast majority of all age groups that completed the consultation questionnaire were in favour of the proposal. The largest percentage of objection came from the 25-44 age group (7%) and 45-64 age group (10%) in relation to the proposed boundary. These objections related largely around wanting the proposed area to be wider.

Ethnicity

Ethnicity	%
South Asian	2.4%
Black British / African / Caribbean	34.1%
White British	14.1%
Greek / other Western Europe	7.1%
Turkish Kurdish	20%
Lithuania / other Eastern Europe	7.1%
Chinese	1.2%
Not stated	14.1%
Total	100%

The vast majority of respondents from all identified ethnicities was in favour of the PSPO.

Data was not collected as part of the consultation for the remaining protected characteristics, therefore the alternative sources of data identified in this report will be relied on to analyse potential impact. It is also noted that the small response rate to the consultation is indicative that the collection of other data during the consultation may not have made a significant difference to the assessment.

There was overall support from all groups that shared protected characteristics, for the PSPO to be introduced. It is therefore the Council's intention to continue with the proposal to introduce the PSPO on the Love Lane estate area with no changes to the defined restrictions, other than the removal of the prohibition related to rough sleeping. Given the public feedback, concerning the boundary of the PSPO, a slight adjustment to the affected area, to include both sides of Whitehall Street, is proposed.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within

1. Sex

There is a broadly even distribution of men and women in the Northumberland Park ward.

The prohibited activities listed in the terms of the proposed PSPO for the Love Lane estate include actions to prevent behaviour, which disproportionately impacts on women, as, for example, the Council has identified that individuals are regularly propositioning women who live on the estate.

The Council has identified that activities of individuals that contribute to ASB have also tended to be male. Therefore, the proposed PSPO is likely to impact directly on men. Mitigating actions will be put in place to address any adverse impact, as set out below.

The vast majority of women who took part in the consultation were in favour of the proposed PSPO.

The overall impact on this protected characteristic is likely to be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

2. Gender reassignment

The Council does not have data based on this protected characteristic. The Council does not envisage the PSPO will have a disproportionate impact on this particular protected characteristic. The Council will identify and address any equality implications for this group through the monitoring of the implementation of the PSPO in a way that does not discriminate against an individual or group who shares a protected characteristic.

Positive		Negative		Neutral impact	X	Unknown Impact	
----------	--	----------	--	----------------	---	----------------	--

3. Age

The proposed PSPO is likely to have a disproportionate impact on children and young people, aged 0-19 as the prohibited activities listed in the terms are particularly dangerous to children and young people. The proposed PSPO will therefore will improve the quality of life for children and young people, who are more likely to spend time outside their homes and in the areas currently affected by the ASB. The proposed PSPO will specifically reduce substance use on the estate, which will reduce the risk of children and young people exposed to dangerous substances and the drug trade.

The Council is not aware of the specific age profile of the individuals who are likely to breach the PSPO and be negatively impacted by its powers. The Council will identify and address any equality implications through monitoring the implementation and enforcement of the PSPO.

The overall impact on this protected characteristic is likely to be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

4. Disability

In Northumberland Park there is a higher proportion of residents with long-term conditions and disabilities. These conditions can increase vulnerability to ASB. For example, the Council has experienced significant ASB issues in and around communal lifts, which disproportionately impacts residents with limited mobility who need to use the lift to access their property. The proposed PSPO is likely to have a positive impact for Love Lane estate residents with disabilities as it aims to reduce such ASB.

The Council is not aware of any disabilities of the individuals who commit ASB in the estate. However, the Council will identify and address any equality implications for this group through monitoring the implementation and enforcement of the PSPO.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

5. Race and ethnicity

It is likely that the Black and Minority Ethnic population (White Other; Black African; Black Caribbean; Black Other) will be disproportionately impacted by the proposed PSPO.

The Council has identified that among the individuals committing ASB in the estate and likely to breach the terms of the proposed PSPO, some are of Eastern European ethnicity. As a consequence, the Council can infer that the PSPO may negatively impact individuals of this ethnicity disproportionately.

However, the proposed PSPO will have wider positive impacts (through the reduction of ASB and improvement in safety and cleanliness of the environment) for the White Other and Black minority groups, who are overrepresented in Northumberland Park when compared to the borough, regional and national averages. Moreover, there has been a reduction in the presence of Eastern European rough sleepers in the last 6 months, which mitigates the potential disproportionate effect of the proposed PSPO.

A majority of residents from all ethnicities who responded to the consultation was in favour of the proposed PSPO.

It is considered that the overall impact on this protected characteristic will be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

6. Sexual orientation

The proposed PSPO is not likely to have a disproportionate impact on this protected characteristic. Therefore, it is considered that the impact is likely to be neutral.

The Council does not hold data on the sexual orientation of the individuals who regularly commit ASB in the estate. However, the Council will identify and address any equality implications for this group by monitoring the implementation of the PSPO.

Positive		Negative		Neutral impact	X	Unknown Impact	
----------	--	----------	--	----------------	---	----------------	--

7. Religion or belief (or no belief) We do not expect this decision to impact upon religion or belief

The proposed PSPO is not likely to have a disproportionate impact on this protected characteristic. Therefore, it is considered that the impact is likely to be neutral.

The Council does not hold data on the sexual orientation of the individuals who regularly commit ASB in the estate. However, the Council will identify and address any equality implications for this group by monitoring the implementation of the PSPO.

Positive		Negative		Neutral impact	X	Unknown Impact	
----------	--	----------	--	----------------	---	----------------	--

8. Pregnancy and maternity We do not expect this decision to impact upon pregnancy and maternity

There is a disproportionately high number of 0-4 year olds and it is likely that there is a high birth rate in the Northumberland Park ward. The proposed PSPO will positively impact residents with the pregnancy and maternity protected characteristic as it will reduce ASB and associated behaviour, ensuring parents can raise their children in a safe and clean environment.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

9. Marriage and Civil Partnership

People who are in a civil partnership will be treated the same as people who are married.

Positive		Negative		Neutral impact	X	Unknown Impact	
----------	--	----------	--	----------------	---	----------------	--

10. Groups that cross two or more equality strands e.g. young black women

Women and households with children are likely to be disproportionately impacted by the proposed PSPO.

It is considered that the powers given to the Council through the PSPO will aim to reduce ASB and associated behaviour and improve the safety, cleanliness and general environment of the estate, which will positively impact female single-headed households, who are overrepresented in some of the identified buildings in the estate.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**

This includes:

- a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
 - b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
 - c) **Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

Overall, the proposed PSPO is likely to have a positive impact on individuals and groups who share a protected characteristic and the wider community in the Love Lane estate.

Impact of existing PSPOs in Haringey

The Council introduced a PSPO in South Tottenham in 2016, which has acted as an effective tool for the Council and police in tackling ASB. The introduction of the PSPO has resulted in a reduction in men gathering in the locality and a reduction in men urinating, defecating and drinking alcohol in the area. The PSPO has contributed significantly to the fostering of good relations between communities in the area.

Impact on individuals who may breach the proposed PSPO

The terms of the proposed PSPO prohibit certain behaviours and activities in the estate, which may directly impact on individuals or groups from ethnic minorities and younger males, as the Council has identified that these characteristics are overrepresented in the individuals who are currently committing ASB in the estate.

However, the Council will ensure that the proposed PSPO will be implemented and enforced in a way that does not result in discrimination towards any particular group. The authorised officers who will monitor the area and enforce the PSPO will consider the needs of individuals and their personal circumstances in order to make an informed decision as to the appropriate action to take. The police and council enforcement officers will ensure that any action taken is proportionate to and balanced against the risks posed, to either an individual or the wider community (for example: seriousness of offence, any past history, repeated non-compliance).

As part of the Council's wider work to support the Love Lane estate area, officers will

ensure that StreetLink, Thamesreach and any other appropriate service is able to reach and support the individuals who breach the PSPO and may be rough sleepers. It is the intention of the Council to maximise the number of individuals who leave the estate with the appropriate support prior to the formal introduction of the PSPO. The Council is committed to ensuring that the impacts of breaching the PSPO will be mitigated by the support and signposting that officers can provide to the affected individuals.

Impact on residents who share protected characteristics

it is considered that the proposed PSPO will positively impact on the following protected characteristics:

- Sex – women;
- Age – children and young people;
- Disability – residents with impairments on their ability to do day-to-day tasks;
- Race and Ethnicity – Black and Minority Ethnic residents;
- Pregnancy and Maternity – pregnant women and mothers with young children; and
- Cross-cutting – female, single-headed households.

It is anticipated that the proposed PSPO will benefit Love Lane estate residents as it will reduce ASB and improve safety and cleanliness in the area. The proposed PSPO aims to deter individuals from engaging in such ASB and enable residents to feel that the estate is safe and welcoming. The Council is aware that women, children, and those with disabilities in particular have been affected by ASB on the estate. These groups are likely to benefit most from the PSPO.

Overall, the proposed PSPO will foster good relations between groups who share protected characteristic and those who do not. The ASB that exists in the Love Lane estate is contributing to tensions in the community and the Council considers that the PSPO acts as an effective tool to foster an environment which is safe, clean and where residents, including those who share a protected characteristic, can live in the estate without fearing for their safety.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
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.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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	N

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.	N
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale
Sex	Offer assistance to the individuals identified as sleeping rough by engaging with StreetLink, negating the need for enforcement action under the PSPO. Linking with services that can offer additional support to EEA individuals e.g. Thamesreach, St Mungos, Women at the Well.	Allison Pibworth	Engagement has already started with the relevant agencies and the number of rough sleepers has significantly reduced.
Race and Ethnicity	As above	Allison Pibworth	On going
	Ensure interpreters and translation is available for the any individuals encountered. Utilising services that can offer assistance to individuals of Eastern European ethnicity and any other ethnicity identified e.g. Thamesreach, new rough sleeping support initiatives	Allison Pibworth	On going

Please outline any areas you have identified where negative impacts will happen as a result 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 them.

It has been identified that the proposed PSPO may disproportionately impact on individuals of Eastern European ethnicity. The Council will make efforts to identify individuals who are committing ASB in the estate and may need support. However, this has previously been challenging due to the transient nature of these individuals.

To tackle some of the systemic issues affecting the individuals concerned, the Council is undertaking work in relation to supporting Haringey's recent and emerging migrant communities. The Connected Communities programme support recently arrived migrants through tailored support including housing, employment, and personal finance support.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

- Enforcement team will monitor the implementation and enforcement of the PSPO. All enforcement will be recorded on the council's M3 database system so that reports can be generated to gauge the level of warnings and fines issued or prosecutions pursued.
- Regular discussions with the police will take place to monitor breaches of the PSPO and to enable evaluation of any disproportionate impact.
- Reminders/updates can be given to residents at council meetings or Ward Panel Meetings held by the police, or through the Regeneration engagement team
- The PSPO will be monitored to ensure that ASB is not displaced to areas adjoining the affected area of the Love Lane Estate.

7. Authorisation

EqlA approved by
 (Assistant Director/ Director)

Date

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.