

Equality Impact Assessment (EIA)

Document control

Title of activity:	<i>Extension to Romford Town Centre PSPO EIA</i>
Type of activity:	<i>Anti-Social Behaviour Reduction</i>
Lead officer:	<i>Kerry Wright – Senior Community Safety Officer</i>
Approved by:	
Date completed:	
Scheduled date for review:	<i>April 2024</i>

The Corporate Policy & Diversity team requires **5 working days** to provide advice on EIAs.

Did you seek advice from the Corporate Policy & Diversity team?	No
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality Impact Assessment Checklist

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#).

Please complete the following checklist to determine whether or not you will need to complete an EIA. Please ensure you keep this section for your audit trail. If you have any questions, please contact the Corporate Policy and Diversity Team at diversity@havering.gov.uk

About your activity

1	Title of activity	<i>Extension to Romford Town Centre PSPO EIA</i>
2	Type of activity	<i>Anti-Social Behaviour Reduction</i>
3	Scope of activity	<p><i>On 20th October 2014, the Government overhauled the tools and powers available to local authorities and the Police to tackle anti-social behaviour.</i></p> <p><i>The Public Space Protection Order allows local authorities to set conditions to tackle anti-social behaviour in a specific defined area.</i></p> <p><i>The Council is seeking to extend the already live Public Space Protection Order with conditions to control alcohol related nuisance within Romford town centre.</i></p>
4a	Is the activity new or changing?	<i>Changing – The current PSPO has been in place since October 2017 It to expired in October 2020 and was extended for a further 3 years. A further extension will be requested for a further 3 years.</i>
4b	Is the activity likely to have an impact on individuals or groups?	<i>Both</i>
5	If you answered yes:	<i>Please complete the EIA on the next page.</i>
6	If you answered no:	

Completed by:	<i>Kerry Wright</i>
Date:	<i>2nd August 2023</i>

2. Equality Impact Assessment

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#).

For more details on the Council's 'Fair to All' approach to equality and diversity, please visit our [Equality and Diversity Intranet pages](#). For any additional advice, please contact diversity@haverinq.gov.uk

Please note the Corporate Policy & Diversity Team require **5 working days** to provide advice on Equality Impact Assessments.

Please note that EIAs are public documents and must be made available on the Council's [EIA webpage](#).

Understanding the different needs of individuals and groups who use or deliver your service

In this section you will need to assess the impact (positive, neutral or negative) of your activity on individuals and groups with **protected characteristics** (this includes staff delivering your activity).

Currently there are **nine** protected characteristics (previously known as 'equality groups' or 'equality strands'): age, disability, sex/gender, ethnicity/race, religion/faith, sexual orientation, gender reassignment, marriage/civil partnership, and pregnancy/maternity/paternity.

In addition to this, you should also consider **socio-economic status** as a protected characteristic, and the impact of your activity on individuals and groups that might be disadvantaged in this regard (e.g. carers, low income households, looked after children and other vulnerable children, families and adults).

When assessing the impact, please consider and note how your activity contributes to the Council's **Public Sector Equality Duty** and its three aims to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity, and
- foster good relations between people with different protected characteristics.

Guidance on how to undertake an EIA for a protected characteristic can be found on the next page.

Guidance on undertaking an EIA

Example: Background/context							
<p><i>In this section you will need to add the background/context of your activity. Make sure you include the scope and intended outcomes of the activity being assessed; and highlight any proposed changes.</i></p> <p style="text-align: right;"><i>*Expand box as required</i></p>							
Example: Protected characteristic							
<p>Please tick (✓) the relevant box:</p> <table border="1"> <tr> <td>Positive</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Neutral</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Negative</td> <td><input type="checkbox"/></td> </tr> </table>	Positive	<input type="checkbox"/>	Neutral	<input type="checkbox"/>	Negative	<input type="checkbox"/>	<p>Overall impact: <i>In this section you will need to consider and note what impact your activity will have on individuals and groups (including staff) with protected characteristics based on the data and information you have. You should note whether this is a positive, neutral or negative impact.</i></p> <p>It is essential that you note all negative impacts. This will demonstrate that you have paid 'due regard' to the Public Sector Equality Duty if your activity is challenged under the Equality Act.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>
Positive	<input type="checkbox"/>						
Neutral	<input type="checkbox"/>						
Negative	<input type="checkbox"/>						
<p>Evidence: <i>In this section you will need to document the evidence that you have used to assess the impact of your activity.</i></p> <p><i>When assessing the impact, please consider and note how your activity contributes to the three aims of the Public Sector Equality Duty (PSED) as stated in the section above.</i></p> <p><i>It is essential that you note the full impact of your activity, so you can demonstrate that you have fully considered the equality implications and have paid 'due regard' to the PSED should the Council be challenged.</i></p> <ul style="list-style-type: none"> - <i>If you have identified a positive impact, please note this.</i> - <i>If you think there is a neutral impact or the impact is not known, please provide a full reason why this is the case.</i> - <i>If you have identified a negative impact, please note what steps you will take to mitigate this impact. If you are unable to take any mitigating steps, please provide a full reason why. All negative impacts that have mitigating actions must be recorded in the Action Plan.</i> <p style="text-align: right;"><i>*Expand box as required</i></p>							
<p>Sources used: <i>In this section you should list all sources of the evidence you used to assess the impact of your activity. This can include:</i></p> <ul style="list-style-type: none"> - <i>Service specific data</i> - <i>Population, demographic and socio-economic data</i> <p><i>Suggested sources include:</i></p> <ul style="list-style-type: none"> - <i>Service user monitoring data that your service collects</i> - <u>Havering Data Intelligence Hub</u> - <u>London Datastore</u> - <u>Office for National Statistics (ONS)</u> - <u>SafeStats</u> <p><i>If you do not have any relevant data, please provide the reason why.</i></p>							

The EIA

Background/context:

On 20th October 2014, the Government overhauled the tools and powers available to local authorities and the Police to tackle anti-social behaviour.

The Public Space Protection Order allows local authorities to set conditions to tackle anti-social behaviour in a specific defined area.

Following on from the sanctioned Romford Town Centre PSPO in 2017, the Council extended the Order with conditions to control alcohol related nuisance within Romford town centre for a further three years.

The PSPO is an enforcement measure which sets a defined list of conditions to minimise nuisance behaviour within the Town Centre.

As such, it is not targeted at any individual or group but instead seeks to tackle any person whose behaviour is associated with drunkenness and alcohol related nuisance.

**Expand box as required*

Age: Consider the full range of age groups

*Please tick (✓)
the relevant box:*

Positive

Neutral

Negative

Overall impact:

Age is not a factor in the issuing of FPN's, however, PSPO conditions can be applied to anyone over the age of 10. When serving an FPN against a minor the Council is required to inform YOS and the Legal guardian of the young person.

**Expand box as required*

Evidence:
N/A

**Expand box as required*

Sources used:

ASB Crime and Policing Act 2014

Gov.UK Online Guidance
<https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils>

**Expand box as required*

Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions

<i>Please tick (✓) the relevant box:</i>		Overall impact: The threshold for issuing a fixed penalty notice (FPN) rests with the serving Officer if they deem the behaviour to be a breach of the conditions within the PSPO. As such, it is expected that any Officer issuing a FPN gives due care and regard to any physical, mental, sensory and progressive conditions that may impact the person’s ability to understand the consequence of breaching the PSPO. As such, the conditions within the PSPO should not adversely impact upon any specific individual or group.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	

**Expand box as required*

Evidence:
N/A

**Expand box as required*

Sources used:

ASB Crime and Policing Act 2014

Gov.UK Online Guidance
<https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils>

**Expand box as required*

Sex/gender: Consider both men and women	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: The conditions of the PSPO apply regardless of a person's gender or gender identity <i>*Expand box as required</i>	
Evidence: N/A <i>*Expand box as required</i>	
Sources used: ASB Crime and Policing Act 2014 Gov.UK Online Guidance https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils <i>*Expand box as required</i>	

Ethnicity/race: Consider the impact on different ethnic groups and nationalities	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: The PSPO conditions will apply to anyone regardless of ethnic group or background. <i>*Expand box as required</i>	

Evidence:
N/A

**Expand box as required*

Sources used:

ASB Crime and Policing Act 2014

Gov.UK Online Guidance
<https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils>

**Expand box as required*

Religion/faith: Consider people from different religions or beliefs including those with no religion or belief

<i>Please tick (✓) the relevant box:</i>		Overall impact: None of the conditions within the PSPO should have an effect on a person's ability to worship/follow religious beliefs
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	

**Expand box as required*

Evidence:
N/A

**Expand box as required*

Sources used:

ASB Crime and Policing Act 2014

Gov.UK Online Guidance
<https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils>

**Expand box as required*

Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual

<i>Please tick (✓) the relevant box:</i>		Overall impact: The issuing of FPN's are not influenced by sexual orientation
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	

**Expand box as required*

Evidence:
N/A

**Expand box as required*

Sources used:

ASB Crime and Policing Act 2014

Gov.UK Online Guidance
<https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils>

**Expand box as required*

Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

<i>Please tick (✓) the relevant box:</i>		Overall impact: None of the conditions within the PSPO will have an effect on a person's sexuality or sexual identity
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	

**Expand box as required*

Evidence:
N/A

**Expand box as required*

Sources used:

ASB Crime and Policing Act 2014

Gov.UK Online Guidance
<https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils>

**Expand box as required*

Marriage/civil partnership: Consider people in a marriage or civil partnership	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact:</p> <p>None of the conditions within the PSPO will have an effect on a person's marriage, civil partnership nor any other form of civil or religious union</p> <p><i>*Expand box as required</i></p>	
<p>Evidence:</p> <p>N/A</p> <p style="text-align: right;"><i>*Expand box as required</i></p>	
<p>Sources used:</p> <p>ASB Crime and Policing Act 2014</p> <p>Gov.UK Online Guidance https://www.gov.uk/guidance/fixed-penalty-notice-issuing-and-enforcement-by-councils</p> <p style="text-align: right;"><i>*Expand box as required</i></p>	

Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave	
Please tick (✓) the relevant box:	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: None of the conditions within the PSPO specifically target those who are pregnant or on any form of leave associated with child care.	
<i>*Expand box as required</i>	
Evidence: N/A	
<i>*Expand box as required</i>	
Sources used: ASB Crime and Policing Act 2014 Gov.UK Online Guidance https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils	
<i>*Expand box as required</i>	

Socio-economic status: Consider those who are from low income or financially excluded backgrounds	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact:</p> <p>The conditions within the PSPO may have an adverse effect on Homeless people seeking consume alcohol within the Town Centre while seeking shelter.</p> <p>It is acknowledged that many Homeless people within the town centre have alcohol related dependencies. As such they run the risk of facing the penalties associated with breaching the PSPO.</p> <p>The FPN may have a limited impact on the Homeless but the seizure and destruction of alcohol may result in additional financial hardship for those who seek to replace supplies lost.</p> <p>Additionally, the possible impact on homeless should be viewed in the context of supplementary support/visits being carried out by the Housing department to try and resolve homelessness within the Borough.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>	
<p>Evidence: N/A</p> <p style="text-align: right;"><i>*Expand box as required</i></p>	
<p>Sources used:</p> <p>ASB Crime and Policing Act 2014</p> <p>Gov.UK Online Guidance https://www.gov.uk/guidance/fixed-penalty-notices-issuing-and-enforcement-by-councils</p> <p style="text-align: right;"><i>*Expand box as required</i></p>	

Action Plan

In this section you should list the specific actions that set out how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer

* You should include details of any future consultations you will undertake to mitigate negative impacts

** Monitoring: You should state how the negative impact will be monitored; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

Review

Once in force the extended PSPO will last for 36 months. It is therefore recommended that review commence in April 2024 (allowing six months for Member and public consultation). The EIA should also be reviewed at this time and within this body of work.