

Equality Impact Assessment Template

Please complete this template using the [Equality Impact Assessment Guidance document](#)

Version 3: January 2013

Title of proposal (include forward plan reference if available)	Public Spaces Protection Order - West Bromwich Town Centre
Directorate and Service Area	Neighbourhoods
Name and title of Lead Officer completing this EIA	Gary Bowman
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Names and titles of other officers involved in completing this EIA	Kashmir Singh Tessa Mitchell, Business Manager, Community Safety and Resilience
Partners involved with the EIA where jointly completed	WM Police
Date EIA completed	18 June 2018
Date EIA signed off or agreed by Director or Executive Director	28 June 2018
Name of Director or Executive Director signing off EIA	Alan Caddick, Director of Housing and Communities;
Date EIA considered by Cabinet Member	28 June 2018

See [Equality Impact Assessment Guidance](#) for key prompts that must be addressed for all questions

1. The purpose of the proposal or decision required (Please provide as much information as possible)

The report seeks approval for implementation of a Public Spaces Protection order (PSPO) covering West Bromwich Town Centre, as defined by the map shown at Appendix 1, for 3 years commencing 1st August 2018 and for an officer implementation group to be established to oversee the work of the council and its partners to implement the PSPO and other relevant actions to combat crime and ASB in the proposed area.

The report provides details of the results of the consultation process regarding a Public Spaces Protection Order (PSPO) covering West Bromwich Town Centre, as defined by the map shown at Appendix 1.

The report describes the restrictions that will be outlined in the proposed Public Spaces Protection order (PSPO) as detailed in Appendix 2.

2. Evidence used/considered

Analysis of crime and ASB in Sandwell using records provided by council ASB team and WM Police, and feedback from our local communities, dialogue with our partners and intelligence from police regarding strategic and tactical assessments informed us that the following issues persist in West Bromwich.

- Alcohol related violence and ASB
- Threatening and Intimidating behaviour
- Violence in a public place
- Begging
- Nuisance parking

3. Consultation

The council has completed a consultation exercise over 6 weeks ending in May 2018. The results (see summary at Appendix 3) showed overwhelming support for actions to be taken to address the following issues of concern from across the area shown on the map at Appendix 1.

4. Assess likely impact

Please give an outline of the overall impact if possible.

Victims of crime and ASB will be positively impacted as they will be less likely to be victims of anti-social behaviour and crime.

The town centre will benefit as the current reputation it has gained for crime, ASB, threatening and intimidating behaviour, violence will be improved as a result of the PSPO.

There will be a reduction of obstructions impacting on the mobility of persons, which will impact especially positively on those whose mobility is most restricted, i.e. persons with a disability, persons who have long term limiting illness affecting their mobility, persons using aids to improve their mobility including wheelchairs, mobility scooters, prams and pushchairs.

There will be an impact on persons who are begging publicly in the town centre. However, the PSPO implementation group have extensively considered this potential negative impact and have determined that their approach will aim to reduce inappropriate begging by persons who are not homeless or in serious poverty. The aim of the PSPO implementation group will be to reduce begging of those who are in need of housing, in acute financial need or being exploited for the financial gain of others, by supporting vulnerable persons and helping them to address the issues faced by the individuals themselves and their families.

Please complete the table below at 4a to identify the likely impact on specific protected characteristics

4a. Use the table to show:

- Where you think that the strategy, project or policy could have a negative impact on any of the equality strands (protected characteristics), that is it could disadvantage them or if there is no impact, please note the evidence and/or reasons for this.
- Where you think that the strategy, project or policy could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relationships within equality characteristics.

Protected Characteristic	Positive Impact ✓	Negative Impact ✓	No Impact ✓	Reason and evidence (Provide details of specific groups affected even for no impact and where negative impact has been identified what mitigating actions can we take?)
Age	/	/		<p>There will be a reduction of obstructions impacting on the mobility of persons, which will impact especially positively on those whose mobility is most restricted, i.e. persons with a disability, persons who have long term limiting illness affecting their mobility, persons using aids to improve their mobility including wheelchairs, mobility scooters, prams and pushchairs.</p> <p>There may be potential or perceived negative impact on young people who are innocently using the town centre but are perceived to be a nuisance or threat. They may be asked to disperse without cause. This is not the intention of the PSPO but it is recognised as a potential negative impact of its implementation. The council has engaged with and will continue to engage with the colleges and sixth form centres in and near the town</p>

				centre area. Officers who have enforcement powers will be briefed to take care regarding how to mitigate this risk whilst still firmly and appropriately dealing with nuisance or anti-social behaviour.
Disability	/			There will be a reduction of obstructions impacting on the mobility of persons, which will impact especially positively on those whose mobility is most restricted, i.e. persons with a disability, persons who have long term limiting illness affecting their mobility, persons using aids to improve their mobility including wheelchairs, mobility scooters , prams and pushchairs.
Gender reassignment			/	
Marriage and civil partnership			/	
Pregnancy and maternity	/			There will be a reduction of obstructions impacting on the mobility of persons, which will impact especially positively on those whose mobility is most restricted, i.e. persons with a disability, persons who have long term limiting illness affecting their mobility, persons using aids to improve their

				mobility including wheelchairs, mobility scooters, prams and pushchairs.
Race			/	
Religion or belief			/	
Sex			/	
Sexual orientation			/	

<p>Other;</p> <p>Persons who are homeless, being exploited, or in such great financial need that they feel begging is necessary to eat every day.</p>	/	/	<p>Including begging within the PSPO has been decided after very careful consideration. The risk of simply displacing the begging to other areas outside the area covered by the order is acknowledged.</p> <p>It is also acknowledged that there could be a negative impact on vulnerable people but the council and police will put systems in place to minimise any negative impact and provide support to genuinely vulnerable persons. The implementation group will review implementation on an ongoing basis.</p> <p>Where vulnerable persons are identified and are willing to receive offers of help and support, the council and police will pursue this route as the preferred option. Enforcing officers will be trained and made aware of our approach to begging and be able to offer or signpost to the appropriate help and support.</p> <p>The restrictions on begging within the PSPO will be implemented in such a way as to identify specifically those individuals who are homeless, being exploited, or in such great financial need that they feel begging is necessary to eat every day. These individuals will be offered support to meet their underlying needs through help with accommodation, access to employment or training or benefits, or other support that helps meet their immediate needs.</p> <p>Conversely, we will aim to identify those who are using begging, by themselves or through exploiting other persons, to gain an income even though their circumstances do not require them to beg. Once identified,</p>
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				action to prevent and enforce action against such individuals will be considered and acted upon.
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Does this EIA require a full impact assessment? Yes No

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then you do not need to go any further. You have completed the screening stage. You must, however, complete sections 7 and 9 and publish the EIA as it stands.

If you have answered yes to the above, please complete the questions below referring to the guidance document.

5. What actions can be taken to mitigate any adverse impacts?

The intention of the Council and police to directly engage with persons who are begging will be a central element of the implementation plan steered by the implementation group.

The implementation group will be chaired by the director of housing and communities who will take steps to ensure that housing management services and work of other directorates focus on meeting needs of individual persons who are suffering homelessness, exploitation or hunger. This issue will be a standard item on the agenda of the implementation group and reports on the progress of vulnerable persons whom the PSPO has engaged with will be considered at each meeting.

6. As a result of the EIA what decision or actions are being proposed in relation to the original proposals?

The issues identified in sections 3 and 4 of the report were identified as part of the process of planning the PSPO and the consideration of equality impacts by the implementation group

Although not a major outcome of the consultation exercise, the council and its partners were aware of a wish from a minority of respondents to protect vulnerable persons.

National guidance has been substantially strengthened from December 2017 to specifically discourage PSPOs being established that are likely to impact adversely on vulnerable persons including homeless persons. The implementation group has given close regard to this guidance.

7. Monitoring arrangements

The implementation group will be chaired by the director of housing and communities who will take steps to ensure that housing management services and work of other directorates focus on meeting needs of individual persons who are suffering homelessness, exploitation or hunger. This issue will be a standard item on the agenda of the implementation group and reports on the progress of vulnerable persons whom the PSPO has engaged with will be considered at each meeting.

8. Action planning

The actions are detailed above and using the table below is not necessary.

9. Publish the EIA

The EIA will be published by the council along with the cabinet report prior to the cabinet meeting and decision on 25 July 2018