

APPENDIX D: EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	PSPO for area surrounding Wembley Stadium
DEPARTMENT:	Regeneration & Environment
Serrvice Area	Regulatory Services
LEAD OFFICER:	Yogini Patel Snr Regulatory Service Manager
DATE:	30/10/2019

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The consultation process ran from 30/08/2019 to 30/09/2019 to adopt PSPO for the area surrounding Wembley Stadium. Twenty six responses were received. Overwhelming majority of those who responded support the PSPO proposals. Summary report is attached in Appendix C.

Sporting and other recreational activities such as concerts at Wembley Stadium, SSE Arena and now the new Wembley Troubadour Theatre attract thousands of people (at times exceeding 90,000 people). However, the experience of those attending the venue, those working in the area and residents is seriously marred by illegal traders (including ticket touts), street drinkers, littering (including urination), unauthorised distribution of printed material etc. whose activities blight our streets and spaces around Wembley Stadium as well as the footprint between Wembley Park, Wembley Stadium and Wembley Central Stations.

The activities listed above have detrimental impact on the quality of life for those in the locality or activities likely to take place will have a detrimental impact. The impact of these activities is likely to be persistent, unreasonable and therefore restrictions are proposed.

2. Who may be likely to be affected by this policy or proposal?

Any person residing or visiting the area surrounding Wembley Stadium.

Those who may undertake authorised activities listed below will be affected:

1. Unauthorised street trading
2. Unauthorised distribution of free literature.
3. Unauthorised charity street collectors
4. Those who street drink
5. Those who litter.
6. Unauthorised Fly-posting .
7. Unauthorised flying of drone

8. Unauthorised games or competitions.
 9. Unauthorised pyrotechnics including fireworks or smoke emitters.
 10. Idling engines.
 11. Unauthorised busking including use of loud speakers

3. Is there relevance to equality and the council's public sector equality duty? If your answer is no, you must provide an explanation.

26 responses were received.

On average more than 80% of respondents strongly agreed or agreed to the proposals and are in favour of implementing the PSPO.

This proposal is to anti-social behaviour. Once the PSPO is introduced, any enforcement undertaken needs to be analysed to ensure that there are no unintended consequences on any of the protected characteristics.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

1. Introducing PSPO for illegal street trading including ticket touts

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))		x	
Gender (Men / Women)	x		
Race	x		
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)	x		
Religion / Belief	x		
Sexual Orientation (Gay / Lesbian / Bisexual)	x		
Gender Re-assignment	x		
Marriage & Civil Partnership	x		
Pregnancy & Maternity	x		
Homelessness	x		
Socio-economic issues	x		

Positive Impact

Most people will be protected from being sold tickets at inflated prices which may also not be accepted at the gates. Members of the public will be protected from traders selling illegal merchandise which are often of poor quality and counterfeit.

2. Distribution of free literature

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))		x	
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness		x	
Socio-economic issues		x	

3. Unauthorised street collections

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))	x		
Gender (Men / Women)	x		
Race	x		
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)	x		
Religion / Belief	x		
Sexual Orientation (Gay / Lesbian / Bisexual)	x		
Gender Re-assignment	x		
Marriage & Civil Partnership	x		
Pregnancy & Maternity	x		
Homelessness	x		
Socio-economic issues	x		

Positive Impact

On the whole people are generous when donating for a charity or a cause. However, those who street collect without proper authorisation may be defrauding the public by not forwarding funds to the intended charity.

4. Consumption of alcohol.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)			x
Race			x
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)			x
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness			x
Socio-economic issues			x

Negative Impact

Most young people more likely to congregate in parks and open spaces, Olympic Way in Wembley as a means of meeting each other. Men are more likely to be engaged in this activity in public spaces. Borough-wide data has shown an over representation of eastern European, Asian and white British groups. However, in the Wembley area it will be fans visiting for an event that are likely to engage in street drinking.

Socio economic factors could also contribute negatively to those who have been homeless and sleeping rough. To some this is a choice as they do not wish to engage with support services.

5. Littering (such as cigarettes, bottles, cans, packets, food, urinating).

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)			x
Race			x
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)			x
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness			x
Socio-economic issues			x

Negative Impact

Most visiting Wembley for events at the Stadium or Arena are likely to congregate in parks and open spaces other areas around Wembley Stadium as a means of meeting each other prior to the event. However, there are people in Brent who are not visitors and have potential to be affected. Therefore, homeless and those who sleep rough are likely to be engaged in this activity. This would need to be recognised by enforcement officers and referred to support services. To some this is a choice as they do not wish to engage with support services

6. Unauthorised fly posting

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness		x	
Socio-economic issues		x	

Negative Impact

Some companies employ young people to undertake fly-posting for a small monetary reward.

7. Un-authorized flying of drones

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))		x	
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness		x	
Socio-economic issues		x	

8 Un-authorised games or competitions

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)			x
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness		x	
Socio-economic issues		x	

Negative Impact

Evidence from enforcement officers suggests that young men undertake playing football in public areas causing obstruction and attracting large crowds leading to anti-social behaviour.

9. Un-authorised pyrotechnics, including fireworks, flares or smoke emitters

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))		x	
Gender (Men / Women)			x
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness		x	
Socio-economic issues		x	

During events at Wembley Stadium, men are found to be undertaking this activity.

10. Idling engines

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))		x	
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness		x	
Socio-economic issues		x	

11. Un-authorized busking

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	
Homelessness			x
Socio-economic issues			x

Negative Impact.

Some people or those experiencing hardship would undertake busking to earn some money.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	Yes	
Does the policy or proposal relate to an area with known inequalities?	Yes	
Would the policy or proposal change or remove services used by vulnerable groups of people?		NO
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	Yes	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Judgements are based on enforcement undertaken by officers during major events at Wembley Stadium based on their observations and encounters.

Evidence and Data is provided in Appendix B. There is no monitoring data available specifically for the area concerned.

Monitoring of enforcement would need to be undertaken to ensure that there are no unintended consequences on any of the protected characteristics.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
Details of impacts identified	<p>People of all ages are present in the PSPO area and those who visit the area during major events in Wembley.</p> <p>Homeless people of all ages may be more likely to sleep rough in parks.</p> <p>Low income groups of all ages are likely to spend more time in outside without the comfort of suitable accommodation and private space.</p> <p>The mitigating action to address this would be ensuring information on the PSPO is communicated using on street outreach in hot spot locations. Also a separate communications plan will be developed to ensure awareness raising through social media platforms which young people use.</p>
DISABILITY	

Details of impacts identified	<p>Information will need to be communicated in an accessible way to ensure people with a disability understand the changes and are not adversely impacted.</p> <p>Also there are risks of a behaviour being interpreted as disorderly when it is actually linked to a disability or mental health condition.</p> <p>The mitigating actions to address this would ensure signage is in large print, plain English and use of pictures to make sure the prohibitions are clearly communicated. Officers will also ensure individuals who are warned in the first instance are referred to ASB Team to ensure vulnerability checks are conducted to shape what consequent action might be taken.</p>
RACE	
Details of impacts identified	<p>Some ethnic groups (e.g. Eastern European and Gypsy Roma Travellers) are over-represented as homeless households in Brent.</p> <p>Brent data also shows that Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough (Source: 2016 population from GLA)</p> <p>Groups may there be adversely impacted by the following: Alcohol Littering Urinating outside Defacing or damaging fixtures</p>
SEX	
Details of impacts identified	<p>Enforcement to date suggests that men are more likely to undertake illegal street trading and street drinking activities during events at the stadium.</p>
SEXUAL ORIENTATION	
Details of impacts identified	<p>No data was obtained in relation to the consultation.</p> <p>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 breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected</p>

	characteristic during the implementation of the PSPO. Enforcement officers will be equipped with electronic devices to capture all equality data.
PREGANCY AND MATERNITY	
Details of impacts identified	No impact
RELIGION OR BELIEF	
Details of impacts identified	<p>Largest proportion of respondents were Christian (35%), no religious belief (27%), Buddhist (4%) Muslim (4%) 23% preferred not to say..</p> <p>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 breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored toward the protected characteristic during the implementation of the PSPO.</p>
GENDER REASSIGNMENT	
Details of impacts identified	We will mitigate any potential equality gaps or issues by capturing the necessary information tailored toward the protected characteristic during the implementation of the PSPO.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	<p>No data was obtained in relation to the consultation.</p> <p>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 breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

Yes

Age

- All members of the community are treated fairly and equally regardless of age. Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant service that can offer support.
- Young People – will be referred into safeguarding mechanisms and under 18's parents/guardians will be spoken with.

Disability

- Vulnerability checks will be conducted on all individuals at the warning stage. We would address any disability concerns and put additional support measures in place if required through prevention, education and sign posting to relevant services and improve accessibility. Often a mental health condition or learning disability may be adversely affected. Behaviour may be mistaken as disorderly when it is linked to a disability
- Under 16's will be referred into safeguarding mechanisms and parents/guardians will be spoken with where necessary.
- Ensure partnership working with Brent Outreach team to have continued access to single Homeless team, community services such as WDP (drug and alcohol service) the mental health support team and Community MARAC for extreme vulnerability that needs multi agency intervention

Race

- All members of the community are treated fairly and equally regardless of race.
- The notice will have a clear pictorial representation showing the various prohibitions not permitted in the area.
- Both the police and council officers undergo diversity awareness training and are aware of their organisation's equal opportunities and diversity policies and procedures.
- Romany Gypsies and Irish Travellers are legally recognised as ethnic groups, and protected from discrimination by the Equality Act 2010 and the Human Rights Act 1998
- Offer assistance to the individuals identified as sleeping rough by engaging with Brent Outreach service negating the need for enforcement action under the PSPO.
- Refer to services that can offer additional support to individuals with no recourse to public funds or EEA individuals e.g. Thames reach. St Mungos,
- Utilising services that can offer assistance to individuals of Eastern European ethnicity and any other ethnicity identified. This will include working with the Partnerships Engagement Team who specifically have a team engaging with the Eastern European community.

Sex -

- Offer assistance to the individuals identified as sleeping rough by engaging with Brent Outreach service negating the need for enforcement action under the PSPO.
- Refer to services such as Advance that help issues around Domestic Violence

Pregnancy And Maternity

- This would be picked up in any welfare assessment carried out and referred into safeguarding mechanisms.
- Refer to children's services to ensure the welfare of the unborn child.
- Refer to services such as Brent Advance to help with concerns around Domestic Abuse.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Black and Minority Ethnic was under represented in the consultation as no responses were received from this group.

5. Please detail any areas identified as requiring further data or detailed analysis.

Yes - we will mitigate any potential gaps or issues by capturing the necessary information tailored toward people affected during the implementation of the PSPO.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

There is potential for negative impacts remaining due to the arguments already raised about the potential for some groups to be overrepresented. Nevertheless, there will be an ongoing positive requirement to support these groups.

Staff issuing PSPOs will be trained on equality and diversity, and the different needs of residents, that Equality Monitoring questions are asked, and that information is provided in an accessible clear way to residents.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

This will be monitored through the Brent Joint Action Group (Multi Agency offender management panel) which meets once every month. It will also include monitoring equality characteristics for those who breach of the PSPO.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The proposal to adopt a PSPO for the area surrounding Wembley Stadium has been undertaken to ensure that enforcement can be undertaken where necessary on private and open land. The Council knows that the majority of those who live, work and visit the borough do keep the area clean and safe; however, it wants to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment.

The creation of the Anti-Social Behaviour (ASB) legislation has given local authorities the opportunity to bring in proportionate measures for a maximum of 3 years and is being adopted by many local authorities in the UK. The creation of the Anti-Social Behaviour (ASB) legislation has given local authorities the opportunity to bring in proportionate measures for a maximum of 3 years and is being adopted by many local authorities in the UK.

For these vulnerable groups where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.

Where persistent ASB is being committed by any of these vulnerable groups they would be a priority at CSU meetings under – High risk and vulnerable persons and would have additional target support through the Brent Joint Action Group (BJAG). The BJAG is a multiagency panel which meets monthly to tackle ASB and Crime hotspots. Similarly support will also be offered at Community MARAC which supports vulnerable individuals engaged or impacted by anti-social behaviour or crime. We will ensure holistic, multi-agency interventions are applied when dealing with these groups. Enforcement officers will enforce proportionately, assessing each breach on a case-by-case basis with warnings issued in the first instance and fixed penalty notices should there be non-compliance. All individuals issued with warnings will be shared with the Anti-Social Behaviour Team. Background checks on individuals will be conducted with mental health and support services to identify the best course of action and this often will not result in enforcement. A further breach of the warning could result in a £100 fine.

The rights of individuals will be respected and all practices carried out lawfully with robust arrangements for support services, interventions, sign posting referrals and welfare assessment with provision of appropriate support as necessary

There will be clear signage in the proposed area making everyone reasonably aware of the prohibitions. There will also be specific targeted communications, utilising social media and other media outlets to ensure the prohibition is fully understood.

The following articles of the Human Rights Act have been considered:

Article 1: Protection of Property

Point to be considered:

1. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions (example drinking a can of beer) except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

However, the positive impact would be to safeguard members of the public and the wider community.

Article 2: Right to Life

Point to be considered:

2.2 (b) in order to effect a lawful arrest or to prevent the escape of a person lawfully detained;
The PSPO Prohibition around nuisance recognised as positive to safeguard members of the public and the wider community.

Article 6

Everyone charged with a criminal offence has the following minimum rights:

(a) to be informed promptly, in a language which he understands and in detail, of the nature and cause of the accusation against him;

Article 8: Right to respect for private and family life

Point to be considered:

8.2 There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

The positive impact reduces the risk to members of the community of threat, risk and harm. It can also provide a route into support agencies.

Article 10: Freedom of expression

Point to be considered:

10.2 The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.

The positive impact is that the removal of alcohol may modify behaviour and, where relevant, better enable support service engagement.

SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
<p>Disability</p> <p>Communication and information provided in accessible to ensure people with a disability that affects communication or information needs understand the proposal – for example making sure information is in large print and Easy Read</p> <p>Training PSPO officers on equality and diversity, including understanding the needs of residents making sure information is in large print and Easy Read</p> <p>As for disability concerns, additional support measures are in place if required through education and sign posting to relevant services to improve accessibility</p>	<p>All disabled groups are reasonably made aware of the order and relevant signage put in place.</p>	<p>Tara Benham</p> <p>Natalie Gordon</p>	<p>November 2019</p>

<p>SEXUAL ORIENTATION</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Dennis Lewis</p>	<p>Throughout the duration of the order</p>
<p>RELIGION OR BELIEF</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Dennis Lewis</p>	<p>Throughout the duration of the order</p>
<p>MARRIAGE & CIVIL PARTNERSHIP</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Dennis Lewis</p>	<p>Throughout the duration of the order</p>
<p>Age</p> <p>Additional Support measure would be put in place through prevention and education and sign posting to relevant support service that can offer support</p> <p>Young people will be referred into safeguarding mechanisms and under 18's parent / guardians will be spoken with</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Dennis Lewis</p>	<p>Throughout the duration of the order</p>

<p>Race</p> <p>The notice will have a clear pictorial representation showing the various prohibitions not permitted in the area to address does that not understand English as their first Language.</p> <p>Homeless people may be particularly affected. Therefore, monitoring and make up of those who are issued with fines to ensure that protected groups are not being disproportionately negatively impacted upon.</p> <p>Both the police and council officers undergo diversity awareness training and are aware of their organisation's equal opportunities and diversity policies and procedures</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Dennis Lewis</p>	<p>Throughout the duration of the order</p>
<p>Sex</p> <p>Offer assistance to the individuals identified as sleeping rough by engaging with Brent Outreach service negating the need for enforcement action under the PSPO.</p> <p>Refer to services such as Advance that help issues around Domestic Violence</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Dennis Lewis</p>	<p>Throughout the duration of the order</p>

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Yogini Patel
REVIEWING OFFICER:	Natalie Gordon
HEAD OF SERVICE:	Simon Legg