

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	PSPO Nuisance Vehicles and E Scooters
DEPARTMENT:	Community Protection
reworded TEAM:	Anti-Social Behaviour Team
LEAD OFFICER:	Simon Egbor
DATE:	

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 Anti-Social Behaviour, Crime and Policing Act 2014 sets out the tools and powers available to Anti-Social Behaviour partnerships. A tool made available to local government only is the Public Spaces Protection Order (PSPO). This gives councils the ability to enforce with Fixed Penalty Notices or court action any behaviour causing nuisance, alarm, harassment or distress to those who live, work or visit an area. The council has effectively utilised PSPO powers in order to control street drinking since (date). The powers are a critical complementary tool to powers provided to the police and other agencies.

The proposal within this report is to adopt a borough-wide Public Spaces Protection Order (PSPO) in relation to nuisance vehicles and use of e-scooters, for the reasons set out in the body of the report. The behaviours that will fall within the proposed PSPO include street racing and driving in a dangerous way that not only causes excessive noise nuisance for people living and working in Brent but has resulted in a number of accidents and fatalities (can you give me an example ?) in recent years. Other related nuisances within the scope of this proposal include vehicles driving in convoys with no legal justification, vehicles causing obstruction on a public highway and driving over footpaths. This results in damage to the council's infrastructure and endangers the safety of pedestrians and other motorists.

In recent years and particularly during the past 18 months, a significant increase in complaints related to nuisance vehicles has been experienced. In addition, the increased use of E-Scooters has resulted in the requirement to review the powers available in respect of this relatively new form of transport in order to ensure that they are used appropriately and legally. As a result, the council is considering the implementation of a PSPO that will address the following issues;

- I. Revving of Engine(s) as to cause a public nuisance
- II. Repeated Sudden and rapid acceleration (as a public nuisance),
- III. Racing
- IV. Performing stunts (as to cause a public nuisance)
- V. Without lawful authority or reasonable excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy
- VI. Vehicles driving over Footways, Footpaths and Verges without reasonable or lawful excuse (Illegal Crossovers)

- VII. Unauthorised use of a privately owned Electric scooter (E scooter) on the public highway within the London Borough of Brent. (Excluding E scooters under any London approved rental trial scheme).

This proposal is to keep the borough safe, clear of obstruction to protecting life as well to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment. The PSPO will ensure that there is no direct or indirect discrimination, harassment or victimisation, that people with a protected characteristic have equality of opportunity as those who do not have a protected characteristic.

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

This prohibition applies to any area within London Borough of Brent, footway, footpath or grass verge maintainable at the public expense or managed by the Local Authority and which is adjacent to the carriageway or footway of a highway, including adjoining footpaths.

Vehicle "includes a moped, E-scooter, pedal cycle, which includes a power assisted pedal cycle or a pedal cycle in combination with a trailer, constructed or adapted for carrying one or more passengers.

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

Yes

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. Revving of Engine(s) as to cause a public nuisance

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	

Negative Impact

Excessive use of engine revolutions as a way of attracting attention to cars/ motorbikes owned by young people.

2. Repeated sudden and rapid acceleration (as a public nuisance);

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)			
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	

Negative Impact

Young people are a cohort with a tendency to more likely to engage in sudden and rapid acceleration of their vehicle to show the strength and modification done on the cars.

3. Racing

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	

Negative Impact

Young people are more likely to engage in racing. In some cases these drivers engage in races on the local road network, putting both themselves and others at risk.

4. Performing stunts (as to cause a public nuisance);

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	

Negative Impact

Most young people more likely get involved in a range of stunts that include accelerating and braking heavily, as well as spinning their cars.

5. without lawful authority / excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy;

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	

6. Use of an E scooter on the public highway without road tax, insurance, lights or number plates

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	

Negative Impact

All ages likely to be significantly impacted as community have concerns, which do include the nuisance and danger seen and unforeseen, direct and indirectly being caused by some e-scooter users.

7. Any vehicle driving over Footways, Footpaths and Verges.

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	

Negative Impact.

Most likely delivery drivers on mopeds will significantly be impacted. Socio economic factors could also encourage the drivers to maximise their earnings by utilising short cuts to increase the time available to make additional deliveries.

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.

The consultation process ran from 8/11/2021 to 20/12/2021 to adopt a borough-wide Public Spaces Protection Order (PSPO) in relation to issues of Nuisance Vehicles and E Scooters. Ensuring use of the relevant legislation and approaches to maintain a clean and safe environment and deal with other local environmental quality issues including anti-social behaviour.

126 respondents participated in the consultation to introduce the PSPO. Brent population as a whole, which conveys how representative respondents were in respect of age, ethnicity, religion, gender, disability, sexual orientation and gender identity. Older age groups are massively overrepresented in taking part in the consultation. Residents aged 45+ make up about two thirds of respondents (70/104, 67.5%). Over 35% of respondents were White, 15% Asian and 9% Black. 14% of respondents identified as having a disability and over 3% identified as being Lesbian, Gay or Bisexual. Over 45% of respondents identified as Christian, 18% other and just over 5% Muslim and Hindu.

Most responses came from Dollis Hill, Mapesbury and Northwick Park, and the least from Alperton, Fryent, Kenton, Kilburn & Queensbury.

Over 85 % of all responses strongly agreed or agreed with all prohibitions consulted on while under 5% of all responses strongly disagreed or disagreed with the proposals for nuisance vehicles, with 8% disagreeing or strongly disagreeing with the proposed measures in relation to E Scooters.

The majority of respondents did put in supportive comments around the introduction of the PSPO and expressed it would help tackle dangerous driving and illegal crossovers which is seeing a year on year increase. Others felt the introduction of the order would also help police, illicit drug activity that is being perpetrated using E Scooters, giving the police greater powers to stop and account.

There was also direct representation made by the Brent Cycling Campaign who felt the inclusion of pedal cycles within the scope of the order for mounting or riding on the pavement for practical reasons, due to road width restrictions or a cycling instructor taking a few school kids out on a lesson, could be penalised under the order. However, this would fall outside the scope of enforcement as that would be classed as a reasonable and lawful excuse, with a nuisance test always applied by the enforcement officer. The Council's position was further clarified to Brent Cycle Campaign.

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>Negative</p> <p>Young drivers may be more likely to engage with misuse of their vehicles from showing off their high performance vehicle. In addition E-scooters been associated with the young people with reckless use on footpath ways causing danger to pedestrian.</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. In addition, a separate communications plan will be developed to ensure awareness raising through social media platforms which young people use. The PSPO focuses on the misuse of vehicle within the borough irrespective of the age and enforcement officers will not take the age of the individual to account.</p>
DISABILITY	
Details of impacts identified	<p>Neutral</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. Information will be communicated in an accessible way to ensure people with a disability understand the changes and are not adversely impacted.</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>Neutral</p> <p>The PSPO focuses on the misuse of vehicle within the borough irrespective of the race and enforcement officers will not take race of the individual to account when executing the order. The order will apply to everyone however, we cannot suggest if a particular race may be disproportionately affected by the PSPO.</p>
SEX	
Details of impacts identified	<p>Neutral</p> <p>The PSPO focuses on the misuse of vehicle within the borough irrespective of gender of the driver, which will not influence action of the enforcement officers or during the executing of the order, gender will not be taking to account but the nuisance of the vehicle will be the focus. However we acknowledge most of the drivers are males so we expect they may be disproportionately affected by the PSPO.</p>

SEXUAL ORIENTATION	
Details of impacts identified	<p>Neutral</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. Enforcement officers will be equipped with electronic devices to capture all equality data.</p>
PREGANCY AND MATERNITY	
Details of impacts identified	<p>Neutral</p> <p>There is no evidence to suggest pregnancy and maternity would be affected by the PSPO. 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. Enforcement officers will be equipped with electronic devices to capture all equality data.</p>
RELIGION OR BELIEF	
Details of impacts identified	<p>Neutral</p> <p>Christian and other religions are a little overrepresented, Muslim and Hindu respondents are underrepresented. 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>
GENDER REASSIGNMENT	
Details of impacts identified	<p>Neutral</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>
MARRIAGE & CIVIL PARTNERSHIP	

Details of impacts identified	<p>Neutral</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?

<p>Yes</p> <p>Age</p> <ul style="list-style-type: none"> 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. Before the commencement of the PSPO, officers (Brent Council and Police) will be educated on organisation's equal opportunities and diversity policies. The aim and objectives of the PSPO is to keep the borough safe and clear of obstruction by focussing on vehicles, being used a nuisance, which is or is likely to cause harassment, alarm or distress to the community. <p>Disability</p> <ul style="list-style-type: none"> Vulnerability checks will be conducted on all individuals at the warning stage. We would address any disability concerns, 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 Community MARAC for extreme vulnerability that needs multi agency intervention. <p>Race</p> <ul style="list-style-type: none"> 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. <p>Sex</p>

- All members of the community are treated fairly and equally regardless of gender. Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant service that can offer support.

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

There was also direct representation made by the Brent Cycling Campaign who felt the inclusion of pedal cycles within the scope of the order for mounting or riding on the pavement for practical reasons, due to road width restrictions or a cycling instructor taking a few school kids out on a lesson, could be penalised under the order. However, this would fall outside the scope of enforcement, as that would be classed as a reasonable and lawful excuse, with a nuisance test always applied by the enforcement officer. The Council's position was further clarified to Brent Cycle Campaign.

Social media platform such as twitter, Facebook were also used to promote messages out to young people about the consultation. Local police teams also did street briefings at locations where the young people hang out in the priority wards.

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, 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 in 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 borough-wide Public Spaces Protection Order (PSPO) is in line with this priority. In particular, issues of anti-social behaviour, which includes matters that cause harassment, annoyance and / or nuisance. The Council knows that the majority of those who live, work and visit the borough do keep the area safe and clear of obstruction; 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 behaviours identified for the proposed PSPO include street racing, driving in a dangerous way which not only causes excessive noise nuisance for people living and working in the London Borough of Brent but has resulted in a number of accidents and fatalities in the last few years. Other related nuisances within the scope of this proposal include vehicles driving in convoys with no legal justification, vehicles causing obstruction on a public highway and driving over footpaths. This results in damage to the Council's infrastructure and endangers the safety of pedestrians and other motorists.

Under Section 59 of the Anti-Social Behaviour Crime and Policing Act 2014 a Public Spaces Protection Order (PSPO) may be made by the Council after consultation with the Police, Mayor's Office for Policing and Crime, and any other relevant bodies, groups or individuals (such as community leaders or users of a particular area/facility). The PSPO places restrictions and/or requirements on people using the area defined by the PSPO. These can be blanket restrictions or targeted at particular groups (such as dog walkers), or apply at certain times. Breach of a PSPO is a criminal offence that could lead to a fixed penalty notice of £100 or a maximum penalty of £1000 if prosecuted. 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, where 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 within the borough 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 vehicle) 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: Right to a Fair Trial

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>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>Simon Egbor</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>Simon Egbor</p>	<p>Throughout the duration of the order</p>
<p>MARRIAGE & CIVIL PARTNERSHIP</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.	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.	Simon Egbor	Throughout the duration of the order
AGE Additional Support measure would be put in place through prevention and education and sign posting to relevant support service that can offer support Young people will be referred into safeguarding mechanisms and under 18's parent / guardians will be spoken with	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	Simon Egbor	Throughout the duration of the order
RACE 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 Both the police and council officers undergo diversity awareness training and are aware of their organisation's equal opportunities and diversity policies and procedures	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.	Simon Egbor	Throughout the duration of the order
SEX 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.	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.	Simon Egbor	Throughout the duration of the order

SECTION F – SIGN OFF

Please ensure this section is signed and dated.
07/02/22

OFFICER:	Simon Egbor
REVIEWING OFFICER:	Veronica Christopher
HEAD OF SERVICE:	Colin Wilderspin