

## Vulnerable Persons Statement

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Home Office guidance under the Anti-social Behaviour, Crime and Policing Act 2014 comments on the use of Public Space Protection Orders (PSPOs). It states that when used appropriately, proportionately and with local support, PSPOs can be a positive device that help to prevent anti-social behaviour, and can provide an effective response to some of the issues local residents and businesses face on a daily basis. PSPOs can send a clear message that certain behaviours will not be tolerated, and help reassure residents that unreasonable conduct is being addressed.

The guidance also sets out that PSPOs should not be used to target people based solely on the fact that someone is homeless or rough sleeping, as this in itself is unlikely to mean that such behaviour is having an unreasonably detrimental effect on the community's quality of life, which justifies the restrictions imposed. It suggests the council should consider whether the use of a PSPO is the appropriate response and if it will have a detrimental impact on homeless people and rough sleepers.

In addition to those that are homeless or rough sleeping, Brent Council are committed to working with our partners to ensure that other vulnerable persons aren't targeted. This may include those with substance misuse, mental health issues or those that are young or old. We want to ensure that all vulnerable persons whether homeless or not are directed to services to assist them in providing opportunities such as accommodation or alcohol/drug support.

An example of this which is mentioned in the Guidance, relates to when the London Borough of Brent's residents and park users identified issues with public defecation, alcohol use, public disturbances and intimidation. The council introduced a PSPO targeting the cause of the ASB – groups congregating, attracted by offers of casual labour. The council was keen not to enforce against rough sleepers or job-seekers but instead outlaw the offering of employment within the area, and the running of an unlicensed transport service. The aim was to deter those seeking to exploit casual labourers and those profiting from bringing certain groups to the area.

Any prohibitions that are added to any PSPO under review, will ensure that vulnerable and homeless persons aren't targeted. Brent Council will also commit to continued partnership working to ensure that those persons are referred to services in the first instance.

Targeted enforcement measures will only be used to tackle anti-social behaviour where vulnerable persons do not engage in support. This enforcement would consist of measures outside of the PSPO and undertaken alongside our partners whilst integrated support and an offer of accommodation exists. We do not wish to displace, marginalise or isolate persons from support when the support is likely to be the most effective way of dealing with long-term issues.

Where a police officer or Council officer has given direction for a fine to be issued by the local authority, the Community Protection team initially carry out vulnerability checks, as it may not always be obvious that someone is indeed vulnerable. This is an additional process, which avoids fines being issued contrary to the guidance.

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New Beginnings (formerly the Addiction Recovery Clinical Centre) is delivered by Central and North West London NHS Foundation Trust (CNWL) in partnership with Westminster Drug Project (WDP) and B3 (Brent Service User Council). They provide a range of health and wellbeing services to adults and young people in Brent (and across the UK), including drug and alcohol support.

St Mungo's are a service dedicated to ending rough sleeping. Each night they currently provide a bed and support to 2888 persons. Their 180 services support people experiencing homelessness across the South East and South West of England and help them in their recovery from homelessness.

Brent Council will continue to work in partnership with WDP, B3 & St Mungo's to ensure that vulnerable persons are assisted and not targeted. Where enforcement is required, it is important that this is carried out in a way that supports an effective long-term solution for those vulnerable persons.