

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	PSPO Nuisance Vehicles Extension
DEPARTMENT:	Community Safety and Prevention
TEAM:	Anti- Social Behaviour Team
LEAD OFFICER:	Noah Okunromade
DATE:	28/04/2025

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 council is proposing to extend the borough-wide Public Spaces Protection Order (PSPO) in relation to Nuisance Vehicles. A consultation process ran from 27th January 2025 – 16th March 2025. Brent Council is committed to maintaining a clean and safe environment and it is the Council's responsibility to address a range of environmental quality issues, including anti-social behaviour (ASB) perpetrated by nuisance vehicles.

186 responded to the consultation with about 85 % of all responses strongly agreeing or agreeing with all prohibitions consulted on while 9 % of all responses strongly disagreeing or disagreed with the proposals for nuisance vehicles. 6% neither agreed nor disagreed with the PSPO.

The majority of respondents submitted supportive comments around the proposed extension of the PSPO and expressed a view that it would help tackle nuisance vehicle from loud cars, cars revving and racing along major roads, particularly late at night. Cars drifting on the roundabouts near Lakeside Drive NW10 were mentioned as a particular nuisance, as well as cars racing up and down the A40 at night. The noise is disruptive, especially in the evening. Also, some of the driving habits are dangerous, more so at nighttime.

The prohibitions are:

1. Revving of Engine(s) or use of horns as to cause a public nuisance;
2. Repeated sudden and rapid acceleration (as a public nuisance);
3. Racing;
4. Performing stunts (as to cause a public nuisance);
5. Without lawful authority or reasonable excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy;

6. Any vehicle driving over Footways, Footpaths and Verges without reasonable or lawful excuse (Illegal Crossovers)

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

Any person driving a vehicle on any road 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.

Most resident have been impacted by loud cars, cars revving and racing along major roads, particularly late at night. Cars drifting on the roundabouts near Lakeside Drive NW10. The PSPO extension will aim to stop the antisocial use of having a detrimental effect on the quality of life of those in the locality.

Vehicle “includes a moped, 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? Please explain why. If your answer is no, you must still provide an explanation.

Yes, the proposal is relevant to the council’s responsibility to eliminate unlawful discrimination, harassment, and victimisation, as there is a risk of disproportionate targeting of young people, particularly young men, who may be more likely to be associated with the behaviours targeted by the PSPO.

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.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	

Marriage		X	
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5. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		X

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

- 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.

During the consultation, data on the most affected protected characteristics was gathered from those completing the survey. The data and information related to this are presented below.

186 responded to the consultation with about 85 % of all responses strongly agreed or agreed with all prohibitions consulted on while 9 % of all responses strongly disagreed or disagreed with the proposals for nuisance vehicles, with 6% neither agree nor disagree with the PSPO

Respondents in age groups 46+ make up about half of respondents with 57.2%, 36-45 (13.8%), 26-35(10.1%) and 18-25 (2.6%). Over 37.5% of respondents were White, 7.4% Asian and 4.1% Black. 7% of respondents identified as having a disability and about 4.8% identified as being Lesbian, Gay or Bisexual. 25.3% of respondents identified as Christian, 11.6% Hindu, just over 5% Muslim and other religions.

Most responses came from Wembley, Willesden, Kingsbury and Kenton and Kilburn, the fewest were from Harlesden

The majority of respondents did put in supportive comments around the introduction of the PSPO and expressed it would help tackle dangerous driving and noise pollution which is seeing a year-on-year increase.

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

<p>Details of impacts identified</p>	<p>Neutral</p> <p>Young drivers below the age of 35 are more likely to engage with misuse of their vehicles from showing off their high-performance vehicle i.e. strength and modification done on the car thus engage in sudden and rapid acceleration of their vehicle. Young people are more likely to have attended unauthorised car meets for drifting or to spectate.</p> <p>In response, the council plans to ensure that 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> <p>While young people are likely to be disproportionately impacted by the extension of the PSPO, the impact remains neutral as the PSPO targets those involved in unlawful and dangerous activity.</p>
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DISABILITY

<p>Details of impacts identified</p>	<p>Neutral</p> <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>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>
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RACE

<p>Details of impacts identified</p>	<p>Neutral</p> <p>The PSPO focuses on the misuse of vehicle within the borough irrespective of the race, enforcement officers will not take race of an 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>
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SEX

<p>Details of impacts identified</p>	<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 nuisance of the vehicle will be the focus.</p> <p>However, we acknowledge most of the drivers are males so we expect they may be disproportionately affected by the PSPO as they are likely to be involved in the participation of unauthorised car meet events.</p> <p>While men are more likely to be disproportionately impacted by the extension of the PSPO, the impact remains neutral as the PSPO targets those involved in unlawful and dangerous activity.</p>
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SEXUAL ORIENTATION

<p>Details of impacts identified</p>	<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>
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PREGANCY AND MATERNITY

<p>Details of impacts identified</p>	<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>
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RELIGION OR BELIEF

<p>Details of impacts identified</p>	<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>
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	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.
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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>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>Neutral</p> <p>No data was obtained in relation to the consultation. 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>
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3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?
No

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

Yes, the consultation which took place in January – April 2025 was representative of people who will be affected by the proposal. No representation was received from any group or representative expressing concerns in the extension of the PSPO.

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

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

Displacement could occur to other areas to form hotspots. This will be tracked and managed by responding and deploying enforcement

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

N/A.

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 Act gives councils the authority to implement PSPOs in response to particular issues having a detrimental effect on the quality of life of those in the locality, or (b) is likely to have such an effect provided certain criteria and legal tests are met. The extension of borough-wide Public Spaces Protection Order (PSPO) for Nuisance Vehicles will ensure the council is maintaining a clean and safe environment as part of its responsibility.

The behaviours identified for the proposed PSPO Nuisance Vehicle Extension include street racing, driving in a dangerous way and excessive noise nuisance from modified cars. Other related nuisances within the scope of this extension 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.

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 Community Safety Unit meetings 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 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.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

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
To effectively communicate with residents with disabilities, communication and information will be provided in accessible formats.	All disabled groups are reasonably made aware of the order and relevant signage put in place.	Noah Okunromade	30.05.2028
Training PSPO officers on equality and diversity, including understanding the needs of residents making sure information is in large print and Easy Read			

<p>Additional Support measures would be put in place through prevention and education and sign posting to relevant support service that can offer support to young people who engage in nuisance vehicle behaviours.</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>Noah Okunromade</p>	<p>30.05.2028</p>
<p>To ensure that all Brent residents can understand the information, PSPO information will have a clear pictorial representation showing the various prohibitions not permitted in the area to address those that do not understand English as their first Language</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>All residents are able to understand relevant PSPO information</p>	<p>Noah Okunromade</p>	<p>30.05.2028</p>
<p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic of sex 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>Noah Okunromade</p>	<p>30.05.2028 Throughout the duration of the order</p>

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Noah Okunromade
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Simon Egbor
HEAD OF SERVICE / Operational Director:	