

## EQUALITY IMPACT ASSESSMENT (EIA)

|                         |   |
|-------------------------|---|
| <b>POLICY/PROPOSAL:</b> | PSPO Extension <ul style="list-style-type: none"> <li>• Borough Wide</li> <li>• Parks, Open Spaces, Graveyards and Cemeteries</li> <li>• Wembley Park (Wembley Stadium Events)</li> </ul><br>New PSPO for Notting Hill Carnival |
| <b>DEPARTMENT:</b>      | Community Safety and Prevention   |
| <b>TEAM:</b>            | Anti- Social Behaviour Team   |
| <b>LEAD OFFICER:</b>    | Noah Okunromade   |
| <b>DATE:</b>            | 09/12/2025  |

*EIA Guidance is available online, please reach out to [equality@brent.gov.uk](mailto:equality@brent.gov.uk) for any further support.*

### SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

The council is proposing to extend Public Spaces Protection Order (PSPO) for Borough Wide, Parks, Open Spaces, Graveyards and Cemeteries and Wembley Park (Wembley Stadium Events). In addition, a new PSPO for Notting Hill Carnival which will only operate during the Notting Hill Carnival Period.

A consultation process ran from 11<sup>th</sup> August 2025 – 5<sup>th</sup> October 2025. In addition, a further 2 weeks consultation was conducted on 3<sup>rd</sup> November 2025 – 16<sup>th</sup> November 2025 for Public Spaces Protection Order (PSPO) Consultation – New and Amended Prohibitions.

Brent Council is committed to maintaining a clean and safe environment and it is the Council's responsibility to keep the local environment clear of litter, anti-social behaviour, including other local environmental quality issues affecting the lives of residents and other members of the public.

153 responded to the consultation with about 85 % of all responses strongly agreed or agreed with the extension of the PSPO, while 3.8 % of all responses disagreed with the extension, with 6.4% neither agree nor disagree with the extension.

The majority of respondents submitted supportive comments around the proposed extension of the PSPO and expressed a view that it would help tackle ASB nuisance. The overall consultation findings show that most participants are in favour of the implementation of all prohibitions proposed under the PSPO however, a representation from Dogs of Paddington Old Cemetery (DOPOC) objected to the issue of dogs on leads, with the primary aim of contention being Paddington Cemetery.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

It will affect all residents living within London Borough of Brent regardless of their background as well as businesses and other organisations operating in the Borough. This also includes visitors visiting London Borough of Brent.

A Public Spaces Protection Order is an order that identifies a public place\* referred to in a restricted area\*\* and (a) prohibits specified things being done in the restricted area and/or (b) requires specified things to be done by persons carrying on specified activities in that area.

\*Public place means any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission.

\*\*Restricted area means the area defined to prohibit and/or act upon specified things in that area. The public places would be limited to the London Borough of Brent.

3. If no groups are affected, explain why.

N/A

4. Mark with an "X" the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

| Characteristic  | IMPACT   |              |          |
|---|----------|--------------|----------|
|   | Positive | Neutral/None | Negative |
| <b>Age</b> - People of different age groups.  |          | X            |          |
| <b>Care Experience</b> - People who have been in care for any period of their childhood.  |          | X            |          |
| <b>Disability</b> - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.                      |          |              | X        |
| <b>Gender reassignment</b> - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender. |          | X            |          |
| <b>Marriage and Civil Partnership</b> - Applies mainly in the workplace, people who   |          | X            |          |

|  |  |   |   |
|--|--|---|---|
| are married or in a civil partnership.   |  |   |   |
| <b>Pregnancy and Maternity</b> - People who are pregnant, on maternity leave, or new parents.                                      |  | X |   |
| <b>Race and Ethnicity</b> - People of different ethnicity, nationality, and skin colour.   |  | X |   |
| <b>Religion or belief</b> - People of all faiths, and those with no religious belief.  |  | X |   |
| <b>Sex</b> - Differences between men and women, including disparities in pay, career progression, and health outcomes.             |  | X |   |
| <b>Sexual Orientation</b> - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity. |  | X |   |
| <b>Socio-Economic Status</b> – People who are experiencing poverty or socio-economic disadvantage.                                 |  |   | X |
| <b>Other relevant groups*</b><br>Refugees or Asylum Seekers  |  |   | X |

\* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

5. Complete **each row** of the checklist with an “X”.

| SCREENING CHECKLIST  |     |    |
|--|-----|----|
|  | YES | NO |
| Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups? | X   |    |
| Does it relate to an area with known inequalities?   |     | X  |
| Would it add, change, or remove services used by any groups listed in Q4?  |     | X  |
| Does it have negative or positive equality impacts on any groups listed in Q4?   | X   |    |
| <b>If you have answered YES to ANY of the above, proceed to section B.</b><br><b>If you have answered NO to ALL the above, proceed straight to section C.</b>        |     |    |

## SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

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

153 responded to the consultation with about 85 % of all responses strongly agreed or agreed with the extension of the PSPO, while 3.8 % of all responses disagreed with the with the extension, with 6.4% neither agree nor disagree with the extension.

Respondents in age groups 50+ make up about half of respondents with 53.9%, 40-49 (21.2%) 30-39 (14.1%), 20-29(13.1%) 19 or under 18-25 (0%) and no answer (9.6%). Over 51.8% of respondents were White, 16% Asian and 5.1% Black. 10.9% of respondents identified as having a disability and about 5.1% identified as being a gay man, 1.9% identified as bisexual. 23.7% of respondents identified as Christian, 9% Hindu, 5.8% Muslim, Jewish 1.3% and other religions 0.6%.

The majority of respondents submitted supportive comments around the proposed extension of the PSPO and expressed a view that it would help tackle ASB and Nuisance. The overall consultation findings show that most participants are in favour of the implementation of all prohibitions proposed under the PSPO.

7. For each characteristic:

- Provide detail for the impact listed in the response to Q4 in the left-hand box.
- Provide data and evidence to explain how you reached your conclusion in the right-hand box.

Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

| Age  |                                       |
|--|---------------------------------------|
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <b>Neutral</b><br><br>The council plans to ensure that 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 ASB and Nuisance in the borough irrespective of the age and enforcement officers will not take the age of the individual to account.<br><br>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 ASB, nuisance and unlawful activities. |                                       |

| Care Experience  |                                       |
|--|---------------------------------------|
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <p><b>Neutral</b></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>   |                                       |
| Disability   |                                       |
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <p><b>Neutral</b></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, uses plain English and includes the use of pictures to make sure the prohibitions are clearly communicated.</p> <p>A disproportionate number of street homeless people suffer with mental ill health and substance addiction therefore present a higher risk of breaching the PSPO. 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> <p>Individuals with mental ill health who are street homeless who will be negatively impacted by the PSPO will be referred to appropriate support services such as Adult Social Care, Community Multiagency risk assessment conference to collaboratively work together to resolve their homelessness and seek support with their mental Health.</p> |                                       |

| Gender Reassignment  |                                       |
|--|---------------------------------------|
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <p><b>Neutral</b></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 and Civil Partnership   |                                       |
| <p><b>Neutral</b></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> |                                       |
| Pregnancy and Maternity  |                                       |
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |

|   |  |
|---|--|
| <b>Neutral</b><br>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. |  |
|---|--|

| <b>Race and Ethnicity</b>  |                                       |
|--|---------------------------------------|
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <b>Neutral</b><br>The PSPO focuses on ASB and nuisance within the borough irrespective of race, and 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. |                                       |

| <b>Religion or Belief</b>   |                                       |
|---|---------------------------------------|
| Provide detail for the impact listed in Q4.   | Provide supporting data and evidence. |
| <b>Neutral</b><br>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. |                                       |

| <b>Sex</b>  |                                       |
|---|---------------------------------------|
| Provide detail for the impact listed in Q4.   | Provide supporting data and evidence. |
| <b>Neutral</b><br>The PSPO focuses on addressing ASB and the prohibition will apply to all residents irrespective of gender.<br><br>However, we acknowledge most of the individuals that will breach the PSPOS are likely to be males so we |                                       |

|   |  |
|---|--|
| <p>expect they may be disproportionately affected by the PSPO as they are likely to be involved in attending most Wembley 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 breaching the prohibition to cause nuisance.</p> |  |
|---|--|

| <b>Sexual Orientation</b>  |                                       |
|--|---------------------------------------|
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <p><b>Neutral</b></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> |                                       |

| <b>Socio-Economic Status</b>  |                                       |
|---|---------------------------------------|
| Provide detail for the impact listed in Q4.   | Provide supporting data and evidence. |
| <p><b>Negative</b></p> <p>Homeless people may be more likely to be overrepresented in breaching the PSPO, as they are more likely to use public spaces as refugees and locations to sleep. In addition, low-income groups are more likely to spend time outside, as they may have less access to suitable accommodation and private space. A disproportionate number of street homeless people suffer with mental ill health and substance addiction therefore present a higher risk of breaching the PSPO.</p> |                                       |

| Other Relevant Groups  |                                       |
|--|---------------------------------------|
| Provide detail for the impact listed in Q4.  | Provide supporting data and evidence. |
| <b>Negative</b><br><br>Refugees or Asylum Seekers who are new into the UK culture, might not know or understand certain activities are prohibited due to language barriers which are common and written communication is not always a guaranteed delivery system as literacy can sometimes be a challenge. |                                       |

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

Learning sessions were conducted on 9<sup>th</sup> September and 11<sup>th</sup> September 2025 in Asylum hotels around understanding the Law around ASB, Crime and PSPO, for asylum seekers to have an understanding of ASB and conducting themselves in the community.

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

None

## SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G**.
- If you decide not to move forward, explain why, and **do not complete sections E or G**.
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

The consultation which took place in 11<sup>th</sup> August 2025 – 5<sup>th</sup> October 2025 was representative of people who will be affected by the proposal. Representation was received from Dogs of Paddington Old Cemetery (DOPOC) objected to the issue of dogs on leads but however in favour of the extension of the PSPO. 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 from one hot spot to another. This will be tracked and managed by responding and deploying enforcement

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 the Public Spaces Protection Order (PSPO) will ensure the council maintains a clean and safe environment as part of its responsibility in addressing ASB and Nuisance.

For these vulnerable groups, 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 in 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**

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

## **SECTION E - ACTION PLAN AND MONITORING**

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.
- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

| Issue Identified   | Action  | Lead Officer    | Completion Date | Status |
|--|---|-----------------|-----------------|--------|
| All disabled groups are reasonably made aware of the order and relevant signage put in place.  | <p>To effectively communicate with residents with disabilities, communication and information will be provided in accessible formats.</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>  | Noah Okunromade | 31.01.2026      |        |
| 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>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 or ASB.</p> <p>Young people will be referred to safeguarding mechanisms and under 18's parent / guardians will be spoken with and also referral to Family Solutions Service.</p> | Noah Okunromade | 31.01.2026      |        |
| 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 Prohibitions will also pictorial representation to easy understanding and compliance  | Noah Okunromade | 31.01.2026      |        |

|   |   |                        |                   |  |
|---|---|------------------------|-------------------|--|
| <p>the area to address those that do not understand English as their first Language.</p> <p>Both the police and council officers should be aware of their organisation's equal opportunities and diversity policies and procedures.</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, there should be an overrepresentation of this group who contravene the prohibition.</p> | <p>Noah Okunromade</p> | <p>31.01.2026</p> |  |
| <p>Engage with individuals to conduct vulnerability checks with homelessness team, mental health and support services to ensure there are no other underlying support needs.</p>  | <p>Individuals in the first instance must be referred to St Mungo's who specialise in providing support and housing pathways for homeless people to conduct outreach in the identified areas</p>  |                        |                   |  |
| <p>Refugees</p>   | <p>Further learning sessions or plans to engage with refugees and asylum seekers around the PSPOs, and any work to translate the information into other languages.</p>                            |                        |                   |  |
|   |   |                        |                   |  |

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

Data from the warnings and notices served will be analyzed with will enable us to be better informed and address any gaps in our formulation of policies of proposals

## SECTION F – SIGN OFF

|   | <b>Signature</b> | <b>Date</b> |
|---|------------------|-------------|
| <b>Officer:</b>                             |                  |             |
| <b>Reviewing Officer or Head of Service</b> |                  |             |

## **SECTION G – REVIEW**

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

### When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

### Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

### What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

### When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

|   |  |
|---|--|
| <b>Date of 1<sup>st</sup> Review:</b>   |  |
| Officer:  |  |
| Comment on progress toward specific actions, and provide any data and evidence updates: |  |
| Reviewing Officer or Head of Service:   |  |
| <b>Date of 2<sup>nd</sup> Review:</b>   |  |
| Officer:  |  |

|   |  |
|---|--|
| Comment on progress toward specific actions, and provide any data and evidence updates: |  |
| Reviewing Officer or Head of Service:   |  |
| <b><u>Date of 3<sup>rd</sup> Review:</u></b>  |  |
| Officer:  |  |
| Comment on progress toward specific actions, and provide any data and evidence updates: |  |
| Reviewing Officer or Head of Service:   |  |