

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

Directorate: Communities & Environment	Service area: Safer Leeds
Lead person: Harvinder Saimbhi	Contact number: 0113 3789662
Date of the equality, diversity, cohesion and integration impact assessment: 01 September 2017	

1. Title: Crime Reduction Project Officer		
Is this a:		
Strategy /Policy	Service / Function	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If other, please specify		
Service Improvement - Leeds City Council is considering introducing Public Space Protection Orders (PSPOs) for 18 areas in Leeds		

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Stephen Stewart	Safer Leeds	Lead Officer for PSPOs
Hayley Thackwray	Cleaner Neighbourhoods Team	Lead for 'household wastes' element of the proposed Harehills and Armley PSPO.
Lorna Bustard	Safer Leeds	Service Improvement Manager
Harvinder Saimbhi	ASB Team Manager	Head of Service
Neil Bowden	ASB Team Manager	ASB Team Manager
Katy Walton	ASB Team Manager	Partnership Analytical Team

3. Summary of strategy, policy, service or function that was assessed:

Leeds City Council is considering introducing Public Space Protection Orders (PSPOs) for 18 areas in Leeds. An 'Order' is being considered for each individual area to address issues around anti-social behaviour related to alcohol and (in the city centre only) issues around Psychoactive Substances, also known as 'Legal Highs'. We are also taking the opportunity to address behaviours causing specific environmental and public safety/access issues in two of these areas.

PSPOs deal with a particular nuisance in a defined public space where this is having a negative impact on the quality of life for those in that public space.

A PSPO can stop or require an activity. For example, it may limit or stop alcohol consumption in a particular public space, or make requirements on residents relating to the presentation of waste.

Before introducing a PSPO the council must decide if it passes the legal test. For this, the behaviour being restricted has to:

- Be having, or is likely to have, a detrimental (harmful) effect on the quality of life of those in the locality;
- Be persistent or continuing in nature; and
- Be unreasonable

A PSPO lasts for a maximum of three years and can be renewed if necessary

Failure to comply with an order can result in a Fixed Penalty Notice of £100 or a maximum fine of £1000.

There are three activities which the PSPOs aims to tackle:

Alcohol- all 18 areas

- Safer Leeds has evidence and anecdotal information from Safer Leeds Analytical Team, West Yorkshire Police, and Ward Councillors supporting alcohol related PSPOs in all 18 areas.
- Leeds City Council, West Yorkshire Police, and Community Safety Partners including Ward Councillors have advised that the existing DPPOs have been useful for agencies when responding to concerns of anti- social behaviour caused by alcohol. They have told us that providing the legal 'test' is met, they would like to see the DPPO scheme replaced by PSPOs.
- It is therefore proposed that all 18 proposed PSPOs may include a provision which makes it clear the 'Person(s) within the Exclusion Zone will not: consume alcohol,

or be in possession of an open container of alcohol in a public space’.

Psychoactive Substances – City Centre

- Safer Leeds has anecdotal information from West Yorkshire Police supporting a psychoactive substance provision within the proposed city centre PSPO
- Psychoactive Substances mimic the effects of cocaine, ecstasy, amphetamine, and cannabis. They have had their chemical structure altered to avoid being classed as illegal substances.
- They are structured and marketed in such a way as to avoid the controls of the Misuse of Drugs Act 1971, and laws covering ‘Food Standards’ and ‘Medicine’. They are often marketed as ‘Research Chemicals’, and ‘not for human consumption’ and are sold as incense, or plant food; all of this to get around the law. They are often packaged in a way to attract young people.
- The term ‘Legal High’ is not used by Psychoactive Substances professionals as often now, following a law change in May 2016. This term may imply that these substances are safe for consumption. This is not always true.
- The Psychoactive Substances Act (PSA) 2016 came into force on 26 May 2016.
- The Act makes it an offence to produce, supply or offer to supply, import or export any psychoactive substances if the substance is likely to be used for its psychoactive effects.
- The main intention of the ‘PSA’ was to stop shops, websites and people from trading in Psychoactive Substances.
- It is therefore proposed that the City Centre PSPO may exclude the personal use of Psychoactive Substances.

Household Wastes- Harehills and Armley

- **We have anecdotal information from Leeds City Council’s Cleaner Neighbourhoods Team supporting a ‘household wastes’ provision within Harehills and Armley.**
- Residents and Leeds City Council’s Cleaner Neighbourhoods Team have identified issues in some areas with waste receptacles and household waste being left in the street for prolonged periods of time. This is detrimental (harmful) in terms of causing obstructions for vehicles and pedestrians, and in terms of health. When bins are being left out, this causes and contributes to littering, fly tipping and poses a hazard to residents. Despite various initiatives over the years by residents and the Cleaner Neighbourhoods Team, some areas have shown no real improvement.
- It is therefore proposed that the Harehills and Armley PSPO may include a provision which makes it clear when residents should or should not leave out household wastes and waste containers for collection.

4. Scope of the equality, diversity, cohesion and integration impact assessment
 (complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan
 (please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>
Please provide detail:	

4b. Service, function, event
 please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input type="checkbox"/>
Procuring of a service (by contract or grant)	<input type="checkbox"/>
Please provide detail:	

5. Fact finding – what do we already know
 Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.
 (priority should be given to equality, diversity, cohesion and integration related information)

Leeds currently has 18 Designated Public Place Orders (DPPOs), which do not allow people to consume alcohol within certain 'public places'. Following the changes introduced under the Anti-Social Behaviour, Crime and Policing Act 2014, Leeds City Council have to reconsider its DPPOs and either withdraw or replace them with the new Public Space

Protection Orders (PSPOs). We need to do this by October 2017.

Leeds City Council, West Yorkshire Police and our Community Safety Partners have already been provided with evidence of anti-social behaviour within the 18 DPPO areas, and we believe that the proposed Public Space Protection Orders (PSPOs) will help continue to address concerns caused by alcohol or Psychoactive Substances.

We want to replace all 18 DPPOs with PSPOs to help resolve alcohol related anti-social behaviour.

Specific issues within Leeds city centre mean we are suggesting an additional provision within this PSPO to help tackle Psychoactive Substances use.

Additionally, specific issues within some areas mean we are considering an additional provision within PSPOs to help tackle environmental and obstruction issues caused by irresponsible management of household waste. Our current proposals include Harehills and Armley for 'household wastes'.

These issues have been shown through reported incidents, complaints and concerns raised by members of the public, and businesses and key professionals working in community safety.

Public consultation in proposed PSPO areas elicited 1,117 responses from individuals with a direct connection to the locality. 76% of respondents stated that they supported the PSPO. 72% of respondents had observed anti-social behaviour within the area.

**Are there any gaps in equality and diversity information
Please provide detail:**

N/A

Action required:

6. Wider involvement – have you involved groups of people who are most likely to be affected or interested



Please provide detail:

The statutory consultation web based consultation exercise commenced on Monday 12 June 2017 and runs until Sunday 16 July 2017. The consultation was advertised and facilitated through the following media:

- Leeds City Council website and survey www.leeds.gov.uk/pspo
- Communicated with ward councillors
- Leeds City Council Facebook (shared in excess of 100 times).
- Leeds City Council Facebook page picked up by Parkinson's Park FB, Our Guiseley FB, Guiseley Gazette FB, Cross Gates General info and ads FB, Armley Good Stuff FB, Churwell Action Group FB, The Main Deal FB, Farsley Community What's on FB,

Leeds Face FB (shared several times and has membership of 52000+), Horsforth Community Group FB, Guiseley and Yeadon issues FB, West Leeds Country Park FB and Greengateways FB, Changing Leeds FB. There has undoubtedly been many more private shares and community shares.

- Leeds City Council Community Committee Facebook in all communities: Inner East, Inner North, East, Inner North West, Inner South, Inner West, Outer East, Outer North East, Outer North West, Outer South, Outer West.
- West Yorkshire Police Facebook in all divisions: City, Inner East, Inner North East, Inner North West, Inner South, Inner West, Outer East, Outer North East, Outer North West, Outer South, Outer West.
- Leeds City Council Twitter accounts.
- Leeds City Council Cleaner Neighbourhoods Team Facebook.
- Leeds City Council's Housing Leeds Facebook.
- Business Against Crime in Leeds (BACIL) website.
- Leeds Pubwatch website.
- Leeds City Council press release to media outlets; picked up by local publications and generic publications and includes Leeds Multi Agency Blog, Redditt Leeds, Wharfedale Observer, and Telegraph and Argus
- Yorkshire Evening Post (03.07.17 - two page newspaper spread and editorial, plus website). This has also generated on-line/ off-line discussions.
- Leeds Community Safety Partnership Working Area teams have disseminated information and awareness within all 18 proposed PSPO areas.
- Leeds City Council's Communities Teams have disseminated information and awareness within all 18 proposed PSPO areas.
- Leeds City Council's Communities Team- Central have disseminated awareness within Leeds Migration Partnership
- Leeds City Council's Communications and Marketing Business Partner, and Leeds City Council's Safer Leeds Service Improvement Manager have contacted by email Leeds City Council staff.
- Leeds City Council's Crime Reduction Project Officer has contacted by email community safety/ communities/ Housing Leeds / One Stop Centre and HUB staff.
- A Leeds City Council Safer Leeds phone number was provided for telephone advice and assistance
- Community Hubs and One Stop Centre had available staff to help with advice and terminal access for 'non web savvy' customers.
- Leeds City Council's Cleaner Neighbourhoods Team has disseminated information and awareness in Harehills and Armley.
- Leeds City Council's Safer Leeds Crime Reduction Project Officer and Safer Leeds Senior Performance Analyst have communicated weekly to assess progress and to target awareness in key (low participation) areas.

Action required:

N/A

7. Who may be affected by this activity?

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

Equality characteristics

Age

Carers

Disability

Gender reassignment

Race

Religion
or Belief

Sex (male or female)

Sexual orientation

Other

(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)

Please specify:

Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify

Potential barriers.

Built environment

Location of premises and services

Information
and communication

Customer care

Timing

Stereotypes and assumptions

Cost

Consultation and involvement

specific barriers to the strategy, policy, services or function

Please specify

- **Built environment** – some residents have no formal facilities for storing household wastes so may have to store this in the street
- **ACTION** – Cleaner neighbourhoods Team are working to support these residents, will be mindful of these areas, and will not take enforcement action in these cases.

- **Information and communication** – residents and visitors to the city may not be aware of the PSPO's and restrictions around this.
 - **ACTION** – the orders will be on the website and signage will be in place. Information will be publicised throughout social media networks.
1. **Cost** – there are cost implications to the Council in terms of installing signage in the areas served by PSPOs, and enforcement costs (in terms of patrolling the localities) which will be met by existing Police staff. There will be a cost to Safer Leeds for Fixed Penalty Notices, and the administration of those by Leeds City Council. The Cleaner Neighbourhoods Team is currently utilising Fixed Penalty Notices, and prosecutions; and they anticipate a cost through increased enforcement following implementation of PSPOs. This cost has yet to be determined.
- **ACTION** – costs will be monitored and it is anticipated that the positive benefits to residents and visitors will easily justify expenditure.
 - **Customer care** – there may be barriers in terms of accessing information during the day and out of hours.
 - **ACTION** – There is a PSPO page on the LCC website with further information and contact details directing through to the LASBT Team. An email address is available.
 - **Stereotypes and assumptions** – public perception may be negatively impacted. There will be some impact on specific groups. Young people may feel targeted and victimised as a result of this change. Drinking alcohol in a public place (usually within neighbourhoods) often involves young people. By restricting this behaviour we are limiting the harm to young people.
 - **ACTION** – Where appropriate, provide increased educational information on alcohol harm to young people. We will work closely with colleges and universities to ensure that there is a good understanding of the application of the order by their students, and support available where needed. We will monitor equality information – to better understand the issues faced within the community, to enable us to ensure there is a fair and consistent approach to the application of the PSPO, to mitigate against any discrimination and to ensure that the reporting mechanisms and information on the PSPO is accessible to all. We will collect monitoring data on age, gender and ethnicity where the order has been applied.
 - **Consultation and involvement** – not all residents in Leeds will provide feedback on the consultation, so some groups may be under-represented during the consultation process.
 - **ACTION** – consultation opportunities have been provided via a number of different mechanisms, e.g. on-line survey, promotion via social media. There will be on-ogin conversations with elected members and town councillors, engagement with community safety partners, telephone calls and email exchanges with local residents, focus groups and meetings with the voluntary and community sector, where appropriate.

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the

barriers
8a. Positive impact:
<ul style="list-style-type: none"> ▪ People will feel safer across the city ▪ Community cohesion will increase as people feel safer in their neighbourhoods ▪ Coordinated response to ASB ▪ Reduced complaints and dissatisfaction from the general public ▪ Access and signposting to support services more effective as pathways from ASB for vulnerable people are strengthened
Action required:
None

8b. Negative impact:
<ul style="list-style-type: none"> ▪ Young people - Where appropriate, provide increased educational information on alcohol harm to young people. ▪ ACTION – we will work closely with colleges and universities to ensure that there is a good understanding of the application of the order by their students, and support available where needed. ▪ Disability - There is anecdotal information which suggests that using alcohol and or drugs (including Psychoactive substances) is both a cause and an effect of mental health issues. Leeds City Council Officers and West Yorkshire Police Officers have regular meetings with each other and with Community Safety Partners; including those who provide support and provisions for vulnerable people. Alleged offenders will be appropriately signposted to relevant support services. We will continue to refer and signposting individuals to commissioned support services e.g. street outreach (CRC), Forward Leeds, who provide support and help to vulnerable people. ▪ Poverty - There is some anecdotal information which suggests that some deprived areas across the city have disproportionate street drinking; whereas some more affluent areas are more subject to issues around the ‘night economy’. ▪ ACTION - The PSPOs will challenge this behaviour in all public spaces. Partnership Working Areas (PWAs) should be mindful of displacement and should consider appropriate actions. Additionally, we are considering applications in other areas of Leeds. ▪ Language and literacy barriers - Those whose first language is not English or who cannot read will be unable to understand the notice ▪ ACTION: The notice will have a clear pictorial representation showing that drinking alcohol is not permitted in the area. ▪ Street population community - The PSPO will affect those with dependency issues, a known problem for the street population community and can be the reason that led to someone becoming homeless. ▪ ACTION: We will ensure that enforcement is justified/ fair, is sensitive to needs and signposts appropriately to support provisions.

9. Will this activity promote strong and positive relationships between the groups/communities identified?

Yes No

Please provide detail: There are differing stresses within the 18 proposed areas and both potential positive and potential negative relations may be formed.

Action required:
The proposals are largely supported throughout Leeds, and we will actively promote positive outcomes resulting from the PSPO's to evidence improvements in neighbourhoods.

10. Does this activity bring groups/communities into increased contact with each other? (e.g. in schools, neighbourhood, workplace)

Yes No

Please provide detail:
PSPO's will make public spaces more welcoming with an anticipated reduction in street waste, and the occurrence of ASB. It is hoped that residents will feel safer and use public spaces e.g. parks, shopping centres more often. Residents groups and elected members have been heavily involved in the consultation process.

Action required:
None

11. Could this activity be perceived as benefiting one group at the expense of another? (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)

Yes No

Please provide detail:

Action required:

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
<p>Stereotyping and assumptions - Monitor the number of hate incidents experienced by members of the public.</p>	<p>Quarterly review Annual review</p>	<ul style="list-style-type: none"> Number of hate incidents in the area before and after introduction of the PSPO 	<p>Crime reduction Project Officer, Safer Leeds</p>
<p>Young people - Where appropriate, provide increased educational information on alcohol harm to young people.</p> <p>Work closely with colleges and universities to ensure that there is a good understanding of the application of the order by their students, and support available where needed.</p> <p>Monitoring of equality information – to better understand the issues faced within the community, to enable us to ensure there is a fair and consistent approach to the application of the PSPO, to mitigate against any discrimination and to ensure that the reporting mechanisms and information on the PSPO is accessible to all.</p> <p>Collect monitoring data on age, gender and ethnicity where the order has been applied.</p>	<p>Quarterly review Annual review</p>	<ul style="list-style-type: none"> Collect on-going equalities information Work with commissioned services in order to ensure that alcohol services are targeted according to need. 	<p>Crime reduction Project Officer, Safer Leeds</p>

Action	Timescale	Measure	Lead person
<p>Disability – continued referral and signposting to commissioned support services e.g. street outreach (CRC), Forward Leeds, who provide support and help to vulnerable people. Case conferencing for repeat offenders. Mental health considerations will be taken into account by officers when assessing individual cases.</p>	<p>Quarterly reporting</p>	<ul style="list-style-type: none"> ▪ Commissioned service reports evidence number of referrals from partner agencies 	<p>Commissioning Managers – Leeds City Council</p>
<p>Displacement - Partnership Working Areas (PWAs) should be mindful of displacement and should consider appropriate actions.</p> <p>Additionally, we are considering applications in other areas of Leeds.</p>	<p>Quarterly reporting (to Tasking)</p>	<ul style="list-style-type: none"> ▪ Increase or decrease in ASB as reported at local Tasking Meetings 	<p>Crime reduction Project Officer, Safer Leeds</p>
<p>Sex - It is likely that males are disproportionately more likely to engage in street drinking; however the order seeks to prevent this behaviour regardless of gender and therefore a holistic approach is taken.</p>	<p>Quarterly reporting</p>	<ul style="list-style-type: none"> ▪ Number of referrals to support agencies working with males 	<p>Crime reduction Project Officer, Safer Leeds</p>
<p>Poverty - consistent application of PSPOs in all public spaces.</p>		<ul style="list-style-type: none"> ▪ Number of referrals to support agencies ▪ Reduction in number of people drinking in a public space ▪ Reduction in household waste left outside boundary of a residential property 	<p>Crime reduction Project Officer, Safer Leeds</p>

Action	Timescale	Measure	Lead person
<p>Consultation and engagement - consultation opportunities will be provided via a number of different mechanisms, e.g. on-line survey, promotion via social media, conversations with elected members and town councillors, engagement with community safety partners, telephone calls and email exchanges with local residents, focus groups and meetings with the voluntary and community sector.</p> <p>Monitoring the impact that the policy is having on the community to reduce the likelihood of any disproportionately negative impacts on those with protected characteristics.</p>	review periodically	<ul style="list-style-type: none"> ▪ Number of consultation returns ▪ Monitoring of subsequent enquiries 	Crime reduction Project Officer, Safer Leeds
<p>Built environment - Cleaner Neighbourhoods Team are working to support these residents, will be mindful of these areas, and will not take enforcement action in these cases. Staff have been briefed in this area.</p>	Quarterly reporting – review periodically	<ul style="list-style-type: none"> ▪ Absence of customer complaints resulting from LCC error ▪ Reduction in complaints around household wastes being left in inappropriate places 	Cleaner Neighbourhoods Team
<p>Information and communication - There is a PSPO page on the LCC website with further information and contact details directing through to the LASBT Team. An email address is available.</p>	12.06.17 – 16.07.17	<ul style="list-style-type: none"> ▪ Number of customer contacts via consultation 	Crime reduction Project Officer, Safer Leeds
<p>Consultation and engagement - Widespread consultation and information sharing has taken place to ensure the public have opportunities to find out about the PSPO's and voice their</p>	12.06.17 – 16.07.17 (consultation period), followed	<ul style="list-style-type: none"> ▪ Number of different vehicles for people to have influence ▪ % of residents in favour of PSPOs 	Crime reduction Project Officer, Safer Leeds

Action	Timescale	Measure	Lead person
opinion. Elected members will be kept up to date with progress to ensure transparency and allow further opportunities to consult. Updates following consultation will be published online.	by regular updates		
Street population community - Ensure service users have continued access to commissioned support services.	Quarterly returns form commissioned support providers	<ul style="list-style-type: none"> ▪ Number of referrals to support agencies 	Crime reduction Project Officer, Safer Leeds
Language and literacy barriers - The notice will have a clear pictorial representation showing that drinking alcohol is not permitted in the area.	Quarterly reporting – review periodically	<ul style="list-style-type: none"> ▪ Proportion of PSPOs issues to people who are unable to read the signage 	Crime reduction Project Officer, Safer Leeds

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Harvinder Saimbhi	Head of Operational Delivery – ASB, Hate Crime & Security Services	01.06.2017

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)

As part of Service Planning performance monitoring

As part of Project monitoring

Update report will be agreed and provided to the appropriate board
Please specify which board

Other (please specify) to accompany a Key Decision Report and DDN

15. Publishing

This Equality, Diversity, Cohesion and Integration impact assessment will act as evidence that due regard to equality and diversity has been given.

If this impact assessment relates to a **Key Delegated Decision, Executive Board, full Council** or a **Significant Operational Decision** a copy should be emailed to Corporate Governance and will be published along with the relevant report.

A copy of **all other** Equality and Diversity, Cohesion and Integration impact assessment's should be sent to equalityteam@leeds.gov.uk. For record keeping purposes it will be kept on file (but not published).

Date impact assessment completed**01.09.17**If relates to a Key Decision – **date sent to Corporate Governance****11.09.17**Any other decision – **date sent to Equality Team (equalityteam@leeds.gov.uk)****11.09.17**