

Equality, Diversity, Cohesion and Integration



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: PC Neil Haywood	Contact number: 0113 2413336
Date of the equality, diversity, cohesion and integration impact assessment: 17-7-18	

1. Title: Public Space Protection Order for the 'Nowells area' of Harehills, Leeds

Is this a:

Strategy /Policy
 Service / Function
 Other

If other, please specify

Leeds City Council is considering introducing a Public Space Protection Order for the Nowells estate, Harehills Leeds.

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
PC Neil Haywood	Safer Leeds	ASB officer in Operation Leodis, Leeds Anti-Social Behaviour Team.

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

Leeds City Council is considering introducing a Public Space Protection Order (PSPO) for the Nowells estate area in Harehills, Leeds.

An 'Order' is being considered to address issues around anti-social behaviour and hate crime in the area. The order will contain the prohibition **"Person(s) will not: be in groups of 2 or more and engage in anti-social behaviour likely to cause nuisance or annoyance to any other person in the zone"**

The Nowells is a residential area of terraced houses located in Harehills in the eastern area of Leeds. It is a mixture of LCC council, privately owned, private rented and G4S properties. The G4S properties in particular and the private rented properties are occupied by newly arrived residents from outside the UK whose immigration status is being determined by the UK Border Agency. There are large sections of the community who do not speak English. Police crime and call data evidence high levels of anti-social behaviour and criminal acts on the estate.

There are also real underlying issues with hate crime that is not getting reported through to Leeds City Council. Feedback from the LCC Community teams, G4S, local NPT Police Officers and LCC ASB Teams points to high levels of hate crime where families and properties are being targeted by groups on the street because of their immigration status and/or nationalities. Language barriers and a sense of fear are the main barriers to reporting these issues.

The PSPO is one strand of a range of measures currently being pursued to tackle this behaviour.

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.

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.

This order is worded with the following prohibition

"Person(s) will not: be in groups of 2 or more and engage in anti-social behaviour likely to cause nuisance or annoyance to any other person in the zone"

The order is proposed for a period of 12 months, and will allow officers to tackle those committing acts of anti-social behaviour that does not constitute a criminal act but is unacceptable conduct.

The ethos around this order is that it is a preventative tool. It is designed to both act as a deterrent to the behaviours we intend to prevent, and also provide extra powers to officers to tackle the problems when they are ongoing.

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 checked="" type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>
Please provide detail: Consultation on PSPO - 15th June 2018 – 17th July 2018	

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)

The following consultations were carried out and are used as a basis to carry out the assessment.

Residents and the community.

A letter drop was carried out in the 1st instance to every single property located in the zone (583 in total) A copy of this letter is attached on appendix B.

The letter gave a brief explanation about the proposed order and gave a number of lines of communication for residents to feedback on the proposals.

Email and written responses – Eighteen written responses were received via email and post. All eighteen supported the proposals and no objections were raised.

Telephone – Three residents contacted the department supporting the proposals

Community drop in session – Nineteen residents attended the session and all supported the proposals. The summary of the feedback from the session was that the community supported the proposal and felt reassured that it was being considered..

Local government and elected members- Councillor Khan and Councillor Graham were consulted on the Monday 25th June 2018. They fully support the order.

Local Police – Chief Superintendent Money was consulted as head of Leeds District Police and supported the order in principle. The Local Neighbourhood Policing Team (NPT) officers for the area were also consulted. Inspector Preston and Sgt McNiff support the order, and have committed to extra resources in the area in the initial implementation stage whilst the order beds in.

Police and Crime Commissioner – Commissioner Mark Burns-Williamson was consulted on Monday the 9th July and supports the order.

Youth Offending Team – The local Youth Offending Team were consulted and have agreed to the enforcement policy detailed in Section 4, where Youth Offending Team referrals will be made for second stage breaches where youths are involved.

Other Consultation – The proposal was raised at the local area tasking meeting which is attended by stakeholders and agencies working in the area. No objections were raised.

Are there any gaps in equality and diversity information

Please provide detail: No

Action required:

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

Yes No

As above, the consultation process encompassed every resident living in the area with several options to feedback on views. Those living in the area are deemed to be those who are most likely to be affected (either as victims, witnesses or perpetrators)

As above, key partners and stakeholders have also been consulted.

Action required:

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

<input checked="" type="checkbox"/> Age	<input type="checkbox"/> Carers	<input checked="" type="checkbox"/> Disability
<input type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Race	<input checked="" type="checkbox"/> Religion or Belief
<input checked="" type="checkbox"/> Sex (male or female)	<input type="checkbox"/> Sexual orientation	
<input checked="" type="checkbox"/> 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

<input checked="" type="checkbox"/>	Services users	<input type="checkbox"/>	Employees	<input type="checkbox"/>	Trade Unions
<input checked="" type="checkbox"/>	Partners	<input type="checkbox"/>	Members	<input type="checkbox"/>	Suppliers
<input type="checkbox"/>	Other please specify				

Potential barriers.

<input type="checkbox"/>	Built environment	<input type="checkbox"/>	Location of premises and services
<input checked="" type="checkbox"/>	Information and communication	<input type="checkbox"/>	Customer care
<input type="checkbox"/>	Timing	<input checked="" type="checkbox"/>	Stereotypes and assumptions
<input type="checkbox"/>	Cost	<input type="checkbox"/>	Consultation and involvement
<input type="checkbox"/>	specific barriers to the strategy, policy, services or function		

Please specify

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:

People will feel safer, which will impact on community cohesion. The feedback from the community in the Nowells has been overwhelmingly positive in response to this proposal, and there is a sense of relief that this proposal will be used to tackle the anti-social behaviour

In terms of equality, the public meeting actually enhanced community cohesion. A number of people attended of different ethnicities and backgrounds and the meeting brought different elements together in a community sense in the common goal of dealing with high levels of anti-social behaviour.

This nature of this order means that it will only be used against those who are engaging in anti-social behaviour that is causing the community nuisance and annoyance.

Action required:

G4S to monitor their properties where asylum seekers are housed, and will report levels of hate crime and anti-social behaviour on behalf of the residents. This will be fed back to the Nowells Community Team sub group.

8b. Negative impact:

Some people may see the order as a punishment to tackle low level, trivial or benign behaviours

There may be displacement of the behaviour elsewhere.

Action required:

Ensure that enforcement is justified, fair, is sensitive to needs and signposts appropriately to support provisions.

Ensure practitioners are trained in the use of the order and the importance of tackling unacceptable behaviours properly, but there is not an overzealous approach to use of the powers. We will prepare a briefing package and issue aide memoirs to practitioners.

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

Yes

No

Please provide detail:

The public meeting actually enhanced community cohesion. A number of people attended of different ethnicities and backgrounds and the meeting brought different elements together in a community sense in the common goal of dealing with high levels of anti-social behaviour. The community has expressed overwhelming support for this order.

Action required:

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

Yes

No

Please provide detail:

Action required:

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:

The perception and evidence suggests that it is predominantly but not exclusively young people who are committing the acts of anti-social behaviour in the area. This order may be predominantly used against young people.

Action required:

Community Engagement Team are putting diversionary activities in place such as weekly sporting activities at the local community centre. A Fun day is also planned on the communal field.

There are also regular walkabouts by the community engagement team to engage with the community positively and promote these activities

The Youth Offending Team are involved to deal with early breaches in a supportive manner without overuse of Court processes.

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
Some people may see the order as a punishment to tackle low level, trivial or benign behaviours -	3 weeks	<p>Ensure that enforcement is justified and fair, is sensitive to needs and signposts appropriately to support provisions.</p> <p>Ensure practitioners are trained in the use of the order and the importance of tackling unacceptable behaviours properly, but there is not an overzealous approach to use of the powers. This will be done by preparing a briefing package and issue aide memoirs to practitioners.</p>	PC Neil Haywood – Leodis, LASBT Sgt McNiff – Neighbourhood Policing Team
The perception and evidence suggests that it is predominantly but not exclusively young people who are committing the acts of anti-social behaviour in the area. This order may be predominantly used against young people.	8 weeks	<p>Community Engagement Team are putting diversionary activities in place such as weekly sporting activities at the local community centre. A Fun day is also planned on the communal field.</p> <p>There are also regular walkabouts by the community engagement team to engage with the community positively and promote these activities</p> <p>The Youth Offending Team are involved to deal with early breaches in a supportive manner without overuse of Court processes.</p>	Ian Kenning – Communities Team John Lund – Youth Offending Team

Action	Timescale	Measure	Lead person
Monitoring and tackling under reporting of hate crime.	Ongoing	G4S to monitor their properties where asylum seekers are housed, and will report levels of hate crime and anti-social behaviour on behalf of the residents. This will be fed back to the Nowells Community Team sub group.	Sharon Whitaker – G4S

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

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)

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

If relates to a Key Decision – **date sent to Corporate Governance**

Any other decision – **date sent to Equality Team (equalityteam@leeds.gov.uk)**