

## Appendix 5 - Equality Impact Assessment Initial Screening Form

### Stage 1: Initial Screening

**Directorate:** Neighbourhoods

**Service:** Community Safety

**Officer completing EIA:** Sarah Cross

**Other officers involved in completing EIA:**

**Date of Assessment:**

22/02/2021

**Name of policy to be assessed:**

Renewal of the existing Public Space Protection Order (PSPO) – Rochdale Town Centre

**Is this a new or revised policy?**

New  Revised

**What is the purpose of the policy?**

In October 2014 the Antisocial Behaviour, Crime and Policing Act was introduced across England and Wales. This allowed local authorities to apply for Public Space Protection Orders (PSPOs). PSPOs deal with a particular nuisance or problem in an area that negatively affects the local community's quality of life by imposing

restrictions on certain behaviours. The Rochdale town centre PSPO aims to create a welcoming environment for shoppers, visitors and businesses and to tackle antisocial behaviours.

<https://www.legislation.gov.uk/ukpga/2014/12/contents>

The current PSPO, which came into force on 23<sup>rd</sup> July 2018 for a period of 3 years prohibits the following activities:

- Drinking alcohol on the street.
- Driving or using a car in an antisocial manner.
- Obstructing the highway or loitering.
- Antisocial parking.
- Using a skateboard in the restricted area.
- Begging on the street.
- Using a bicycle, scooter or other wheeled vehicle in a way that may cause nuisance, alarm or distress.
- Commercial and charity collections and soliciting for money in the street

The current PSPO is due to end on 23<sup>rd</sup> July 2021 and in order to extend this there is a requirement to review and publicly consult on the order.

<http://www.rochdale.gov.uk/anti-social-activity/public-spaces-protection-orders>

#### **Are there any other objectives?**

To embed the principles of 'good help' and create a partnership approach with place based colleagues, RBC Homelessness service, GMP, Adult Services, Health and voluntary sector organisations such as Petrus and Sanctuary Trust to ensure there are effective links between enforcement and support for vulnerable individuals with complex needs.

#### **Who is likely to benefit from the policy (key stakeholders)?**

- GMP – due to reduced demand
- People who are signposted to support from services rather than engaging in antisocial behaviour
- Residents who live within the Town Centre
- Town Centre businesses
- Town Centre visitors

#### **Is the policy relevant to equality?**

Yes

No

*(Answer yes if you think that the policy has equality considerations for example it has the potential to affect groups in different ways. If you have answered yes, proceed to question 1. If you answered no, move to the sign off section as no further assessment is required)*

### **What information do you have to inform this initial assessment?**

*(List or attach existing data that will help in identifying the potential impact of this policy for example previous consultation; research or practical guidance or any evidence or information that you already have about how this proposal might affect equality in any of the areas covered by the protected groups)*

#### **Demographic Data**

- Census 2011 (demographic data)  
<https://www.ons.gov.uk/census/2011census/2011censusdata/2011censusdatacatalogue>
- Rochdale Borough Profile – (Equality Data)  
<http://www.rochdale.gov.uk/pdf/2018-07-27-equality-and-diversity-data-v1.pdf>

#### **Local Context**

A public consultation was conducted in 2017 for the original PSPO, responses from local businesses supported the proposal and suggested extending the boundary of the PSPO. Many of the businesses and members of the general public who supported the Order wished to see the number of people begging in Rochdale Town Centre reduced as they felt it had a negative impact on the image of the Town and adversely affected business by putting people off coming into the town centre. Objectors to the proposals highlighted that the 'ban on begging' would punish vulnerable members of society by imposing financial penalties they cannot afford. Evidence held by GMP and the Council suggested that the majority of people involved in begging in the Town Centre were not homeless, may have been victims of modern slavery and all were being offered support. There was an acknowledgement that this is a sensitive issue which needed careful handling and mitigating factors put in place to ensure that those who need support are signposted to services and not unnecessarily criminalised.

We know that the PSPO has the potential, if mitigating factors are not put in place, to adversely affect disabled people with mental health issues and also people with complex needs who experience multiple disadvantage. Research by the Mental Health Foundation (<https://www.mentalhealth.org.uk/statistics>) shows that adults with drug dependence are twice as likely as the general population to be using psychological therapy and that

there is a considerable link between homelessness and mental health problems. To mitigate the risk of unnecessarily criminalising vulnerable people, over the past 3 years of the current PSPO a support worker from Petrus, which is a support services for people in housing need, has been working with the Town Centre wardens to offer support and outreach to individuals with complex needs such as substance misuse and mental health issues, to identify issues of homelessness in the town centre and ensure that vulnerable residents, with complex needs are signposted to services, where they can access appropriate support using the principles of 'Good Help'. This post was commissioned by Community Safety, on behalf of the Rochdale Safer Communities Partnership (RSCP). In addition work has taken place directly with Place Based colleagues, RBC Homelessness service, Police Officers, Police Community Support Officers (PCSOs), Adult Services, Health and third sector organisations such as Petrus and Sanctuary Trust to ensure there are effective links between enforcement and support for vulnerable individuals with complex needs in the Town Centre.

<https://goodhelp.org.uk/2020/12/good-help-in-rochdale-seven-reasons-why-the-project-is-working-in-the-era-of-covid/>

Whilst the PSPO is designed to prohibit certain activities it also enables people to feel that the Town Centre is a safe and welcoming place for all and therefore could have a positive impact for people from all protected characteristic groups, tackling anti-social behaviour makes people feel safe and helps to improve the quality of life for everyone that lives, works or visits the borough.

### **Strategic Context**

The GM Police and Crime Plan sets out 3 main priorities which are:-

1. Keeping people safe
2. Reducing harm and offending
3. Strengthening communities and places

The Plan highlights that 'intervention in reducing crime at the root cause is better than tackling it when it has become too difficult to manage. Protecting the vulnerable in society is important.' The plan states a commitment to developing a sustainable, local solution to protecting public spaces and places.

[police-and-crime-plan-standing-together.pdf \(greatermanchester-ca.gov.uk\)](#)

The Rochdale Community Safety Plan sets out how the borough can be a safe and welcoming place for everyone. A key priority is that everyone will be able to enjoy themselves in the town centres. A measure of success is that vulnerable individuals in town centres are able to access services and support packages, which highlights the local approach and commitment to the principles of 'good help.'

[http://democracy.rochdale.gov.uk/documents/s69151/8571\\_RSCP\\_CommunitySafetyPlan\\_2019-2022\\_V2\\_LR.pdf](http://democracy.rochdale.gov.uk/documents/s69151/8571_RSCP_CommunitySafetyPlan_2019-2022_V2_LR.pdf)

### Next Steps

The PSPO is not targeted at any individual or group but instead seeks to tackle defined antisocial behaviour in a specific location, however people from some protected characteristic groups may be disproportionately affected by the PSPO and so a period of consultation is proposed to gather the views of those who will potentially be affected by the PSPO and to ensure that the impact on all protected characteristics is fully understood. The results of the consultation will inform the full EIA and the associated Action Plan will ensure any identified negative impact is mitigated.

The consultation will be published on the RBC Consultation Hub webpage, it is also proposed that all businesses and residents within the area of the PSPO will receive a letter to ask for their comments. The key stakeholders such as Petrus, Sanctuary Trust, Rochdale Boroughwide Housing, Action Together, Rochdale Sixth Form and Hopwood Hall Colleges will be directly involved in the consultation.

### What is the potential impact that the policy could have with regard to the protected characteristics?

*(Identify whether the policy has the potential to impact in a positive or negative way or not at all. For negative impacts use the impact table to calculate a score based on the likelihood that an impact will occur and what the actual impact might be then determine whether it is a High priority (H), Medium priority (M) or Low priority (L))*

There is a potential differential impact for people within some of the protected characteristic groups, within the protected characteristic of Age, there is a potential positive impact on Older people due to a greater feeling of safety within the Town Centre as a result of a decrease in anti-social behaviour, however there may be a negative impact on Younger people as they are more likely to be impacted by the order specifically around the prohibition of using a skateboard in the restricted area. There is potential for a negative impact for disabled people, due to the potential link between people who are homeless, drug dependency and mental health issues but there may be a positive impact for disabled people due to a greater feeling of safety within the Town Centre as a result of a decrease in anti-social behaviour. It is recognised that there may be an overall positive impact for protected characteristic groups due to an increased feeling of safety within the Town Centre as a result of a decrease in anti-social behaviour. Where both a positive and negative impact has been identified the Impact Score in the table below is in relation to the Negative Impact.

	Positive Impact	Negative Impact	Impact Score (1-16)	Impact priority	Neutral Impact
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				(H/M/L)	
Age Younger People (Negative Impact) Older People (Positive Impact)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	6	M	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	12	H	<input type="checkbox"/>
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Marriage or civil partnership	<input type="checkbox"/>	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Pregnancy or maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Religion or belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Serving / ex serving members of the armed forces	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
<b>3. Do any of your negative impact scores identify as high priority on the impact table?</b>					
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					

If you identify a negative impact as being **HIGH PRIORITY** you must complete a full EIA (stage 2 onwards)

**4. How will you minimise/remove any negative impact that identifies as medium or low?**

The PSPO is not targeted at any individual or group but instead seeks to tackle defined antisocial behaviour in a specific location, however people from some protected characteristic groups may be disproportionately affected by the PSPO and so a period of consultation is proposed to gather the views of those who will potentially be affected by the PSPO and to ensure that the impact on all protected characteristics is fully understood. The results of the consultation will inform the full EIA and the associated Action Plan will ensure any identified negative impact is mitigated.

The consultation will be published on the RBC Consultation Hub webpage, it is also proposed that all businesses and residents within the area of the PSPO will receive a letter to ask for their comments. The key stakeholders such as Petrus, Sanctuary Trust, Rochdale Boroughwide Housing, Action Together, Rochdale Sixth Form and Hopwood Hall Colleges will be directly involved in the consultation.

**5. Is a full EIA required?**

Yes  No

<b>Lead Officer Signature:</b>		<b>Date:</b>
<b>Approver Signature</b>		<b>Date:</b>