

BSP EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Resident Services
Service Area	Parks
Service/policy/function being assessed	Public Space Protection Orders
Which borough (s) does the service/policy apply to	Richmond
Staff involved in developing this EINA	Sasha O'Neill, Parks Operations Manager
Date approved by Directorate Equality Group (if applicable)	N/A
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	20/01/26
Date submitted to Directors' Board	n/a – Regulatory Committee reports do not go to Directors' Board

1. Summary

Please summarise the key findings of the EINA.

- The Council would like to renew the Public Spaces Protection Orders (PSPO) to help the police and Council tackle anti-social behaviour on public land. These were initially put in place in 2017 and renewed in 2020 and 2023.
- The PSPOs effectively replaced and updated existing measures including Dog Control Orders, Designated Public Place Orders and Park Byelaws.
- The pool of authorised enforcement officers includes both police and Council officers and they are better able to support each other in dealing with offences.
- The benefit of the PSPOs are that they allow more proactive and effective enforcement against anti-social behaviour in public places through fixed penalty notices. Prior to 2017, apart from Dog Control Orders, Fixed Penalty Notices (FPNs) could not be given for low-level anti-social behaviour and prosecution powers were very rarely used - thus the deterrent was weak.
- An educational approach is generally taken, to give details to offenders why a behaviour is prohibited or required and an opportunity to correct it where possible. Since the renewal in September 2023, 388 FPNs have been issued.
- The outcome sought is that the law-abiding majority can use and enjoy public spaces without fear of anti-social behaviour. This is likely to have a greater positive impact on disabled people, ethnic groups, women, young people and older people.

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Local Data	Data Rich, Parks Customer Satisfaction Survey 2025 (PCSS), Census 2021

National Data	ONS, Census 2021, GLA
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b. Who have you engaged and consulted with as part of your assessment?

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Protected group	Findings																											
Age	<p>Total borough population for Richmond is 195,278 (census 2021). A full breakdown of age groups, with percentages of Parks Customer Satisfaction Survey (PCSS) responses is provided below:</p> <table><tr><th>Age group</th><th>Census (2021)</th><th>PCSS (2025)</th></tr><tr><td>75+</td><td>7.3%</td><td>11.5%</td></tr><tr><td>65-74</td><td>8.9%</td><td>21.2%</td></tr><tr><td>55-64</td><td>12.4%</td><td>26.3%</td></tr><tr><td>45-54</td><td>16.1%</td><td>15.3%</td></tr><tr><td>35-44</td><td>15.9%</td><td>14.5%</td></tr><tr><td>25-34</td><td>11.3%</td><td>2.3%</td></tr><tr><td>15-24*</td><td>10%</td><td>0.8% (20-24)*</td></tr><tr><td>under 14*</td><td>19%</td><td>0.5% (under 19)*</td></tr></table> <p>* Different age categorisation under ages of 18 between surveys shown in brackets</p> <p>In 2021, 16.2% of Richmond’s population was aged 65+, higher than the London average of 12.3%.</p> <p>The park satisfaction survey carried out in 2025, is a self-selecting survey and therefore data from responses may not be fully representative of actual park usage. From those who completed the PCSS, 2.3% of respondents were 25–34-year-olds, despite making up 11.3% of Richmond’s population (census 2021) indicating this age group was underrepresented in the survey. The 55-64 and 65-74 age categories were overrepresented in survey responses when compared to population percentage.</p>	Age group	Census (2021)	PCSS (2025)	75+	7.3%	11.5%	65-74	8.9%	21.2%	55-64	12.4%	26.3%	45-54	16.1%	15.3%	35-44	15.9%	14.5%	25-34	11.3%	2.3%	15-24*	10%	0.8% (20-24)*	under 14*	19%	0.5% (under 19)*
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Disability	<p>Across the borough 12% of people identify as having a disability, compared to 7.4% of respondents to the PCSS.</p>																											

	<p>The table below shows that the smallest proportion of disabled residents are aged between 0-15, whilst the largest proportion of disabled residents are 65 and over.</p> <table><tr><td>Age</td><td>% of Richmond Borough</td></tr><tr><td>0-15</td><td>7.75</td></tr><tr><td>16-24</td><td>7.99</td></tr><tr><td>25-34</td><td>8.66</td></tr><tr><td>35-49</td><td>15.7</td></tr><tr><td>50-64</td><td>21.77</td></tr><tr><td>65+</td><td>38.12</td></tr></table>	Age	% of Richmond Borough	0-15	7.75	16-24	7.99	25-34	8.66	35-49	15.7	50-64	21.77	65+	38.12
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Sex	<p>The table below shows the breakdown of sex in Richmond:</p> <table><tr><td>Sex</td><td>Borough population</td><td>Percentage</td></tr><tr><td>Female</td><td>101,317</td><td>52%</td></tr><tr><td>Male</td><td>93,961</td><td>48%</td></tr></table> <p>54.9% respondents to the PCSS identified as being female, and 37.2% male, 5.1% preferred not to say and 2.8% did not answer in the PCSS.</p>	Sex	Borough population	Percentage	Female	101,317	52%	Male	93,961	48%					
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Gender reassignment	<p>In Richmond, 93.98% of the population are the same gender identity as sex registered at birth, 0.15% are a different gender identity from sex registered at birth, 0.09% are trans women, 0.07% are trans men, 0.04% are non-binary, 0.05% answered all other gender identities and 5.63% abstained from answering the questions (Census 2021)</p> <p>The consultation contains options for free text comments and asks respondents if their gender identity is the same as their sex registered at birth.</p>														
Marriage and civil partnership	<p>The table below provides a breakdown of marital status in the borough:</p> <table><tr><td>Marital Status</td><td>% of the borough</td></tr><tr><td>Married or in a registered civil partnership</td><td>49.48</td></tr><tr><td>Never married and never registered a civil partnership</td><td>35.91</td></tr><tr><td>Divorced or civil partnership dissolved</td><td>8.03</td></tr><tr><td>Widowed or surviving civil partnership partner</td><td>4.66</td></tr></table>	Marital Status	% of the borough	Married or in a registered civil partnership	49.48	Never married and never registered a civil partnership	35.91	Divorced or civil partnership dissolved	8.03	Widowed or surviving civil partnership partner	4.66				
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	Separated, but still legally married or still legally in civil partnership	1.93																									
Pregnancy and maternity	<p>In 2023 there were 1,674 live births in Richmond borough.</p> <p>In 2024 the annual conception rate was 47.2 per 1,000 women. This is lower than the conception rate for England (49 per 1000) (Census, 2021)</p>																										
Race/ethnicity	<p>The table below provides a breakdown of ethnic groups in the borough:</p> <table border="1"> <thead> <tr> <th>Ethnicity</th><th>Richmond</th><th>Richmond %</th><th>PCSS</th></tr> </thead> <tbody> <tr> <td>Asian, Asian British or Asian Welsh</td><td>17,380</td><td>8.9%</td><td>2%</td></tr> <tr> <td>Black, Black British, Black Welsh, Caribbean or African</td><td>3,687</td><td>1.9%</td><td>0.3%</td></tr> <tr> <td>Mixed or Multiple ethnic groups</td><td>10,740</td><td>5.5%</td><td>2.3%</td></tr> <tr> <td>White</td><td>157,206</td><td>80.5%</td><td>81.4%</td></tr> <tr> <td>Other ethnic group</td><td>6,444</td><td>3.3%</td><td>0.8%</td></tr> </tbody> </table> <p>8.9% of Richmond' population are Asian, Asian British or Asian Welsh- 2% of PCSS respondents identified themselves as Asian or Asian British. People identifying themselves as black made up 2% of census returns and 0.3% of PCSS. People identifying themselves as of mixed ethnic groups made up 5% of the population in the census against 2.3% of PCSS respondents. Other ethnic groups made up 3% of the population in the Census, against 0.8% of PCSS.</p>			Ethnicity	Richmond	Richmond %	PCSS	Asian, Asian British or Asian Welsh	17,380	8.9%	2%	Black, Black British, Black Welsh, Caribbean or African	3,687	1.9%	0.3%	Mixed or Multiple ethnic groups	10,740	5.5%	2.3%	White	157,206	80.5%	81.4%	Other ethnic group	6,444	3.3%	0.8%
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Religion and belief, including non belief	<p>In 2021, just under half of residents identified themselves to be of Christian faith (45.3%). Relatively small minorities of residents in the borough identify as Muslim (7.1%), Hindu (2.1%), Sikh (0.6%), Buddhist (1%) or Jewish (0.6%), whilst 37.9% of the population of the borough reported that they hold no religious belief.</p>																										
Sexual orientation	<p>The 2021 Census was the first time it collected data on sexual orientation.</p>																										

	<p>London had the highest percentage of people who identified themselves as lesbian, gay or bisexual (LGB) at 3.8%.</p> <p>In Richmond, 89% of residents were recorded as straight/heterosexual, 1.9% gay or lesbian, 1.2% bisexual 0.3% as ‘all other sexual orientations’ and 7.6% did not answer.</p> <p>The 2026 consultation contains options for free text comments including on impacts on protected groups.</p>																								
Across groups i.e older LGBT service users or Black, Asian & Minority Ethnic young men.	<p>There is no service data to determine any findings across groups. No user feedback has identified an impact.</p>																								
Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups: <ul style="list-style-type: none">• Deprivation (measured by the 2019 English Indices of Deprivation)• Low-income groups & employment• Carers• Care experienced people• Single parents• Health inequalities• Refugee status	<p>Deprivation: Low Income groups & employment: 5.6% of children in Richmond are living in relative low income in 2023/24 (DataRich) compared to 17.8% in London and 22.1% in England.</p> <p>Carers: The table below shows the number of hours unpaid carers provide in Richmond: (Census 2021)</p> <table><tr><th>Place</th><th>9 hours or less</th><th>10 to 19 hours</th><th>20 to 34 hours</th><th>35 to 49 hours</th><th>50 or more hours</th></tr><tr><td>Richmond</td><td>3.4</td><td>1</td><td>0.5</td><td>0.6</td><td>1.6</td></tr><tr><td>London</td><td>2.6</td><td>1</td><td>0.8</td><td>0.9</td><td>2</td></tr><tr><td>England</td><td>3.2</td><td>1.2</td><td>0.8</td><td>1</td><td>2.6</td></tr></table> <p>Care Experienced People: In 2024/25 Richmond has 110 Children Looked After, a rate of 25.0 per 10,000, which was the lowest out of all London Boroughs. This was 51% lower than the London average and 64.3% lower than the England average.</p> <p>Single Parents: The 2021 census data found that 5.2% of children live in a single parent household in comparison to 16.1% across the UK.</p> <p>Health inequalities: As mentioned above 5.6% of children in Richmond are living in relative low income which could impact health. In Richmond there is a 12.1% gap in employment rate between those with a long term health condition and overall employment compared to 10.2% in London and 10.4% in England in 2021/22 (Data Rich).</p> <p>Refugee Status:</p>	Place	9 hours or less	10 to 19 hours	20 to 34 hours	35 to 49 hours	50 or more hours	Richmond	3.4	1	0.5	0.6	1.6	London	2.6	1	0.8	0.9	2	England	3.2	1.2	0.8	1	2.6
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	There are 842 people with refugee status outside of the Hong Kong BNO scheme currently living in Richmond.	
	Scheme	Richmond
	Syrian Resettlement scheme (2015-date)	Six families (32 people)
	Afghan Resettlement scheme (2025)	26 people
	Homes for Ukraine scheme (2025)	1098
	Unaccompanied Asylum Seeking Children	23
	Hong Kong BNO scheme	No exact data available, but proxy data shows 497 School Applications from Hong Kongers and 985 people indicated they were born in Hong Kong in the 2021 Census

Data gaps

Data gap(s)	How will this be addressed?
Data on any potential differential impact of enforcement action	Monitoring of enquiries and complaints about enforcement provide insight into potential differential impacts. Consultation will provide insight into potential differential impacts.

4. Impact

Protected group	Positive	Negative
Age	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage children, young people and older people to make greater use of parks and public places.</p> <p>In the 2023 PSPO consultation 83% of respondents stated the PSPO would have a positive impact on groups with 'Age' protected characteristic.</p> <p>The positive and negatives impacts will be reviewed again following the</p>	<p>Young people are more likely to spend time in public places for socialising and recreation, including activities that may take place later in the evening. As a result, the impact of the PSPO on restricting behaviours such as gathering, playing music, or consuming alcohol could disproportionately affect them and may limit how they use these spaces.</p> <p>There is potential for the provision against going to the toilet in public places could have a greater impact on children and older people.</p>

	2026 PSPO renewal public consultation.	<p>In order to mitigate the potential negative impacts identified above the following mitigating actions have been identified:</p> <ul style="list-style-type: none"> • Officers undergo Equality and Diversity training before deployment (this is standard practice). • Officers will use their discretion over the circumstances involved in any incident, making reasonable adjustments for age. For example, except where a complete prohibition is in place, as it is for drones, activity that falls within the realms of normal play is unlikely to be enforced against unless the location is completely inappropriate. • Further, where public urination and defecation is concerned, Officers will use their discretion over the circumstances and person involved, including when dealing with children, older people or those with medical issues. • A discussive, educational approach will be taken first and a warning given before any enforcement action. • There will be publicity about the renewal of PSPOs and both temporary and permanent signage used to explain the measures in place. <p>In the 2023 PSPO consultation 17% of respondents stated the PSPO would have a negative impact on groups with 'Age' protected characteristic.</p>
Disability	Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage people with a disability to make greater use of parks and public places.	The PSPOs could have a negative impact on some disabled people, for example those with learning difficulties or sensory impairments. These individuals may find it harder to interpret or respond to the requirements in certain public

	<p>In the 2023 PSPO consultation 87% of respondents stated the PSPO would have a positive impact on groups with 'Disability' protected characteristic.</p> <p>The positive and negative impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>spaces, which could increase the risk of unintentional breaches and potential enforcement action.</p> <p>In order to mitigate the potential negative impacts identified, the following mitigating actions have been identified:</p> <ul style="list-style-type: none"> • Officers would undergo Equality and Diversity training before deployment (this is standard practice). • Officers will use their discretion over the circumstances involved in any incident, making reasonable adjustments for disabled park users. • A discussive, educational approach will be taken first and a warning given before any enforcement action. • There will be publicity about the renewal of PSPOs and both temporary and permanent signage used to explain the measures in place. <p>In the 2023 PSPO consultation 13% of respondents stated the PSPO would have a negative impact on groups with 'Disability' protected characteristic.</p>
Sex	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage women to make greater use of parks and public places.</p> <p>In the 2023 PSPO consultation 82% of respondents stated the PSPO would have a positive impact on groups with 'Sex' protected characteristic.</p> <p>The positive and negatives impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>The PSPOs are unlikely to have a negative impact in terms of sex.</p> <p>In the 2023 PSPO consultation 18% of respondents stated the PSPO would have a negative impact on groups with the 'Sex' protected characteristic.</p>

Gender reassignment	<p>The increased presence in parks to implement the PSPO in the short-term may have the indirect beneficial impact of reducing or deterring hate crime and harassment incidents towards transgender people.</p> <p>In the 2023 PSPO consultation 81% of respondents stated the PSPO would have a positive impact on groups with 'Gender Reassignment' protected characteristic.</p> <p>The positive and negative impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>The PSPOs are unlikely to have a negative impact on transgender people.</p> <p>In the 2023 PSPO consultation 19% of respondents stated the PSPO would have a negative impact on groups with 'Gender Reassignment' protected characteristic.</p>
Marriage and civil partnership	<p>The impact of the PSPO is neutral on the issue of marriage and civil partnerships.</p> <p>In the 2023 PSPO consultation 79% of respondents stated the PSPO would have a positive impact on groups with 'Marriage or Civil Partnership' protected characteristic.</p> <p>The positive and negative impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>The impact of the PSPO is neutral on the issue of marriage and civil partnerships.</p> <p>In the 2023 PSPO consultation 21% of respondents stated the PSPO would have a negative impact on groups with 'Marriage or Civil Partnership' protected characteristic.</p>
Pregnancy and maternity	<p>In the 2023 PSPO consultation 82% of respondents stated the PSPO would have a positive impact on groups with 'Pregnancy and Maternity' protected characteristic.</p> <p>The positive and negatives impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>Pregnant women could more likely to be impacted by the measure against public urination. To mitigate the negative impacts of this:</p> <ul style="list-style-type: none"> • Officers would undergo Equality and Diversity training before deployment (this is standard practice). • Officers will use their discretion over the circumstances involved in any incident, making reasonable adjustments for pregnancy <p>In the 2023 PSPO consultation 18% of respondents stated the PSPO</p>

		would have a negative impact on groups with 'Pregnancy and Maternity' protected characteristic.
Race/ethnicity	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety, and the indirect effects of an increased presence in parks to implement the PSPO, may encourage people from Black, Asian and Minority Ethnic communities to make greater use of parks and public places.</p> <p>In the 2023 PSPO consultation 81% of respondents stated the PSPO would have a positive impact on groups with 'Race' protected characteristic.</p> <p>The positive and negative impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>There are no negative impact of the PSPO anticipated with regard to ethnicity/race.</p> <p>In the 2023 PSPO consultation 19% of respondents stated the PSPO would have a negative impact on groups with 'Race' protected characteristic.</p>
Religion and belief, including non belief	<p>The impact of the PSPO is neutral on the issue of religion and belief including non belief.</p> <p>In the 2023 PSPO consultation 84% of respondents stated the PSPO would have a positive impact on groups with 'Religion or belief' protected characteristic.</p> <p>The positive and negatives impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>The impact of the PSPO is neutral on the issue of religion and belief including non belief.</p> <p>In the 2023 PSPO consultation 16% of respondents stated the PSPO would have a negative impact on groups with 'Religion or belief' protected characteristic.</p>
Sexual orientation	<p>The increased presence in parks to implement the PSPO in the short-term may have the indirect beneficial impact of reducing or deterring hate crime and harassment incidents towards people on the basis of their sexual orientation.</p> <p>In the 2023 PSPO consultation 80% of respondents stated the PSPO would have a positive impact on</p>	<p>During the 2020 consultation, two residents raised the issue that the measure could be used negatively against the LGBT+ community. Whilst the PSPO would be applied in an even manner as outlined above, the following steps were taken to mitigate this potential negative impact:</p> <ul style="list-style-type: none"> • Officers will consult Richmond LGBT Forum about implementation of the order and

	<p>groups with the 'Sexual Orientation' protected characteristic.</p> <p>The positive and negatives impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>any training / advice for patrol officers.</p> <ul style="list-style-type: none"> • There will be publicity about the renewal of PSPOs and both temporary and permanent signage used to explain the measures in place. • Officers would undergo Equality and Diversity training before deployment (this is standard practice). • A considered, educational approach is always be taken first and a warning given before any enforcement action. • Enforcement approach, tolerance levels and use of discretion reviewed on an ongoing basis <p>In the 2023 PSPO consultation 20% of respondents stated the PSPO would have a negative impact on groups with the 'Sexual Orientation' protected characteristic.</p>
<p>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</p> <p>Include the following groups:</p> <ul style="list-style-type: none"> • Deprivation (measured by the 2019 English Indices of Deprivation) • Low-income groups & employment • Carers • Care experienced people • Single parents • Health inequalities • Refugee status 	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage people who are care experienced to access their parks and open spaces more.</p> <p>By reducing the anti-social behaviour and fear for personal safety in parks and open spaces it is ensuring that these free spaces are accessible for people with low-income groups who need them to exercise.</p> <p>The positive and negatives impacts will be reviewed again following the 2026 PSPO renewal public consultation.</p>	<p>The negative impact of the PSPO is neutral on most Socio-economic statuses however it could have a negative impact on those with health conditions regarding the Article on public urination. However, officers will use their discretion over the circumstances involved in any incident, making reasonable adjustments for health conditions. There are also options to appeal any FPN which has been given should the person not wish to disclose personal information at the time.</p> <p>The PSPO could also have unintended negative impacts on people with refugee status or those with limited English proficiency. They may face additional challenges in interpreting the requirements in certain public spaces, which could increase the risk of unintentional non-compliance and potential enforcement action.</p>

		<p>In order to mitigate the potential negative impacts identified above the following mitigating actions have been identified:</p> <ul style="list-style-type: none"> • Officers will use their discretion over the circumstances involved in any incident, making reasonable adjustments for lack of language. • A discussive, educational approach will always be taken first and a warning given before any enforcement action. • There will be publicity about the renewal of PSPOs and both temporary and permanent signage used to explain the measures in place, using symbols where possible.
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5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Following approval of the renewal, check that all required exemptions are in place.	Senior Solicitor	August 2026
Undertake publicity and ensure signage in place to make residents fully aware of the measures.	Parks Service Manager	September 2026
Consider how equalities monitoring of people spoken to related to PSPOs can be undertaken to identify if in practice a particular equality community is being disproportionately affected.	Parks Service Manager	Ongoing
Continue to require all authorised officers to undergo equalities training.	Parks Service Manager	Ongoing
Discuss enforcement approach, tolerance levels and use of discretion with authorised officers and police.	Parks Service Manager	Ongoing

6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
A public consultation is planned for the renewal which will take place for 7 weeks. There are no proposed changes to the PSPO's in relation to antisocial behaviour or dog control. It is an online survey asking for views on each measure, if any restricted behaviour had been experienced and an opinion on whether the PSPO had addressed the issue since 2023. A number of background questions will also be asked, including asking respondents about any potential impacts on groups with protected characteristics. The positive	February and March 2026

and negatives impacts will be reviewed again following the 2026 PSPO renewal public consultation.	
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