

**Public Space Protection Orders – Equalities Impact Needs Assessment**

## SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Chief Executive /Environment and community services
Service Area	Community Safety
Service/policy/function being assessed	PSPO Implementation Proposal
Which borough (s) does the service/policy apply to	Wandsworth
Staff involved in developing this EINA	Clare Carverhill-Rourke
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	27/04/2023 – Andrew Hagger
Date submitted to Directors' Board	

### 1. Summary

**Please summarise the key findings of the EINA.**

This EINA aims to examine and assess any differential impacts that the introduction of a Public Spaces Protection Order (PSPO) may have on any people with protected characteristics who reside, work in or visit the area or any people with protected characteristics who may visit the area in the future. This is likely to have a greater positive impact on disabled people, ethnic groups, women, young people and older people.

**The PSPO, if implemented will address the following issues**

Alcohol related Anti-Social behaviour;

- Including using aggressive, abusive, offensive, threatening, and intimidating language or behaving in an aggressive or intimidating manner

Anti-social behaviour arising from the use of Novel Psychoactive Substances (NPS);

- including the impact of littering of Drug related paraphernalia such as small plastic 'deal bags' and small silver cylinders amongst other known paraphernalia.

Dog Control within all public/open spaces of the borough of Wandsworth.

The outcome sought is that the law-abiding majority can use and enjoy public spaces without fear of anti-social behaviour. Those who would be impacted the most from the PSPO would be Wandsworth residents, visitors and those working within the borough.

**Impact of Proposal: Alcohol Control**

**This proposed PSPO does not seek to prohibit responsible drinking in public spaces, only problematic drinking causing a nuisance to others.**

If implemented, the PSPO will place restrictions on behaviours within all public open spaces within the London Borough of Wandsworth as defined by the PSPO. Additionally, the PSPO would require people in the area to provide their name and address if asked by a Police officer.

The PSPO would also require people to surrender open or un-opened containers of alcohol and, where appropriate, to disperse or leave the area if asked to do so by a Police officer should they be in breach of the restricted behaviour.

The PSPO will have a positive impact for visitors, residents and those working within the borough by safeguarding and facilitating access to the rightful enjoyment of our Parks and Public Open Spaces.

The PSPO will also have a positive impact for staff and volunteers working within the borough's Parks and Public/Open Spaces. They will be less impacted by potential harassment or threats while going about their jobs.

The PSPO is likely to have a negative impact on those who frequently congregate in groups to use alcohol within the borough's parks and public open spaces as the Order will seek to restrict the following behaviour:

- Drunken and disorderly behaviour
- Threats
- Verbal abuse
- Harassment and intimidation

However, as anti-social behaviour has a disproportionate effect on the most vulnerable in our communities it is also likely that those vulnerable groups who habitually congregate to use alcohol will also benefit from the protections offered by the PSPO.

#### **Impact of Proposal: Novel Psychoactive Substances (NPS)**

The PSPO is likely to have a negative impact on the those seeking to use Novel Psychoactive Substances (NPS) within our Parks and Open Spaces, typically males under the age of 25 using 'legal highs' such as NO2 cannisters.

While there is low engagement with services around the use of other 'legal highs' or 'lifestyle drugs' engagement with NO2 cannister users is either low or non-existent.

The restrictions offered by the PSPO therefore offers the opportunity of signposting to services via enforcement and publicity.

#### **Impact of Proposal: Dog Control**

The PSPO will have a positive impact on visitors, residents and those working within the borough, whether using public highways or accessing the Borough's parks and open spaces.

## Background

In 2020 Wandsworth Council implemented a borough-wide PSPO allowing the police to enforce against people found drinking alcohol, consuming Novel Psychoactive Substances (NPS) and causing anti-social behaviour. The Order also covered Dog Control in parks and open spaces. This PSPO is due to expire in October 2023. It is proposed that another three-year Public Spaces Protection Order is introduced to impose the same restrictions with changes to the Dog Control Order only.

The proposed changes to the Dog Control Orders that might impact “users” are:

- the proposed introduction of an annual fee to be paid by Professional Dog Walkers (current licence is free of charge) - this would bring the Council into line with all neighbouring boroughs and the Royal Parks, all of which currently require Professional Dog Walkers to hold a paid for (annually renewable) licence
- the possible/likely reduction from 8 to 6 of the maximum number of dogs allowed by the Council licence – consultation to seek the public’s views on whether the current upper limit of 8 dogs (subject to licence) should be retained or reduced to 6; reflecting current concerns about effective control of dogs.

The Council is proposing to extend the protections offered by the existing borough-wide PSPO, which would address the following reported detrimental behaviours:

- those drinking irresponsibly and acting in an antisocial manner;
- those using Novel Psychoactive Substances (NPS)
- those failing to exercise control of their dogs with the Parks and Public/Open Spaces of the Borough

The full report will take into account the following:

- The legislation and requirements to introduce a PSPO;
- The evidence base that has been gathered and presented to the Council;
- The evidence provided within this proposal and the outcomes of consultation

In seeking to continue to provide a unified order in line with this already tested legal route the council has drawn upon existing models of best practice in other areas. A full options appraisal is therefore not relevant to the scope of this proposal which simply seeks to extend the model of enforcement already in place.

Anti-Social Behaviour legislation allows the Council to implement a Public Space Protection Order to tackle the anti-social behaviour in specific areas that may be having a detrimental effect on the community.

Section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 allows the Council to create a PSPO and establish a zone within which prohibitions or requirements can be imposed to control certain behaviours.

A PSPO establishes a defined geographical area within which certain powers can be conferred and exercised to deal with behaviours which impact upon the quality of life of those who live, work or visit there.

The Council believes that implementing a PSPO is the most appropriate power that could be used alongside other actions to address the wide-ranging issues that had been reported by residents, staff and visitors.

The purpose of the PSPO would be to:

Provide relief to residents, visitors and those working within the borough whose quality of life has been severely impacted upon.

Provide a unified model of enforcement for front line services such as Police who respond to complaints and incidents involving ASB issues.

To respond to repeated complaints made by the local community, about the detrimental effect the “event” has on the quality of life of residents.

## 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
Enforcement Data for the current borough-wide PSPO	ECINS – Data is inputted by the Metropolitan Police and Parks Police
Drugs and Sharps Report	Raychel Peters - Harm Minimisation Officer, Richmond and Wandsworth Council
Findings from the 2012-2013 Crime Survey for England and Wales, 2013	Home Office
Drug misuse in England Wales: year ending March 2020	Office for National Statistics
Nitrous Oxide – Updated Harms Assessments 2023	Advisory Council on the Misuse of Drugs.
Crime Survey for England and Wales (CSEW) April 2020 - March 2021	Office for National Statistics
Health Matters: harmful drinking and alcohol dependence 2016	Public Health England

### b. Who have you engaged and consulted with as part of your assessment?

A public consultation is taking place between 24/04/23 and 04/06/23.

We will also consult with the following organisations about the proposed PSPOS:

- Metropolitan Police Service
- Mayor’s Office for Policing and Crime
- Transport for London
- Local Landlords and Resident Associations
- Chamber of Commerce, Business Improvement District members
- Wandsworth Business Action on Crime
- Neighbourhood Watch Groups

With regards to the Dog Control PSPOs for parks and open spaces, the following organisations will also be consulted:

- Enable Leisure & Culture (who manage Wandsworth Parks)
- Parks Friends Groups and Management Advisory Committees

- Local community groups and societies

### 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>The current borough wide PSPO has been in place since October 2020. Since this time there have been a total of 25 warnings given for ASB caused by drinking alcohol in a public place. Data based on the full period of warnings is shown below:</p> <table border="1"> <thead> <tr> <th>Age</th> <th>Warnings</th> <th>%</th> <th>General Borough Population</th> </tr> </thead> <tbody> <tr> <td>18-21</td> <td>1</td> <td>4%</td> <td>3.4%</td> </tr> <tr> <td>26-35</td> <td>5</td> <td>20%</td> <td>23.4%</td> </tr> <tr> <td>36-45</td> <td>5</td> <td>20%</td> <td>18.3%</td> </tr> <tr> <td>46-55</td> <td>10</td> <td>40%</td> <td>11.9%</td> </tr> <tr> <td>56-65</td> <td>2</td> <td>8%</td> <td>8.5%</td> </tr> <tr> <td>65+</td> <td>1</td> <td>4%</td> <td>9.5%</td> </tr> <tr> <td>Unknown</td> <td>1</td> <td>4%</td> <td>-</td> </tr> </tbody> </table> <p><u>This shows that there have been a disproportionately high number of warnings issued to those aged 46-55 when compared to the general borough population.</u></p> <p>Within this same period there have been a total of 5 warnings issued to individuals for use/possession of novel psychoactive substances in a public place. Data based on the full period of prosecutions is shown below:</p> <table border="1"> <thead> <tr> <th>Age</th> <th>Warnings</th> <th>%</th> <th>General Borough Population</th> </tr> </thead> <tbody> <tr> <td>18-21</td> <td>1</td> <td>20%</td> <td>3.4%</td> </tr> <tr> <td>21-25</td> <td>4</td> <td>80%</td> <td>6.77%</td> </tr> </tbody> </table> <p>This shows that there have been a disproportionate number of warnings issued to those aged 18-25 when compared to the general borough population.</p> <p>A report recently published by the Advisory Council on the Misuse of drugs stated that the proportion of people in treatment citing nitrous oxide as the primary drug they use is generally greatest within the 18–19 year olds and 20–24 year olds age ranges. The number of young people (less than 18 years old) in treatment citing nitrous oxide as the primary drug they use is low. This reached a peak of 27 patients in 2018-2019, then reducing to 19 patients in 2019–2020 and 6 patients in 2020–2021, before increasing to 11 patients in 2021–2022.</p>	Age	Warnings	%	General Borough Population	18-21	1	4%	3.4%	26-35	5	20%	23.4%	36-45	5	20%	18.3%	46-55	10	40%	11.9%	56-65	2	8%	8.5%	65+	1	4%	9.5%	Unknown	1	4%	-	Age	Warnings	%	General Borough Population	18-21	1	20%	3.4%	21-25	4	80%	6.77%
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Of 132 nitrous oxide cases referred to the National Poisons Information Service (NPIS) between 2011 and 2020, the overall mean age was 21.5 years old (range 13–38 years old).  
 It is already illegal to sell nitrous oxide, sometimes known as ‘laughing gas’, for its psychoactive effect but not illegal to consume it. Yet in England and Wales, nitrous oxide has been the third most used drug, after cannabis and cocaine, since 2012. Use is prevalent amongst young people, and at the recent peak, almost one in ten 16-24 year olds reported using nitrous oxide in a 12-month period.

Data based on the warnings given for dog control offences during the same period is shown below:

Age	Warnings	%	General borough population
26-45	7	50	41.87%
46-65	5	35.71	20.10%
Over 65 years	2	14.29	9.36%

This data shows people in the 46 – 65 years age group have been disproportionately affected.

*Information is based on:  
 MPS and Parks Police enforcement data.  
 2023 Nitrous Oxide – Updated Harms Assessments report by the Advisory Council on the Misuse of Drugs.  
 Home Office, Drugs Misuse: Findings from the 2012-2013 Crime Survey for England and Wales, 2013.  
 Office for National Statistics, Drug misuse in England Wales: year ending March 2020.*

**Disability**

Data not collected

**Sex**

The current borough wide PSPO has been in place since October 2020. Since this time there have been a total of 25 warnings given for ASB caused by drinking alcohol in a public place. Data based on the full period of prosecutions is shown below:

Sex	Warnings	%	General Borough Populations
Male	24	96	47%
Female	1	4	53%

This shows that there have been a disproportionately high number of warnings issued to males when compared to the general borough population.

Within this same period there have been a total of 5 warnings issued to individuals for use/possession of novel psychoactive substances in a public place. Data based on the full period of prosecutions is shown below:

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<b>Across groups i.e older LGBT service users or Black, Asian &amp; Minority Ethnic young men.</b>	3 of the 5 warnings issued to individuals for use/possession of novel psychoactive substances in a public place were given to black males aged between 18-25.																												
<b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:</b> <ul style="list-style-type: none"> <li>• Deprivation (measured by the 2019 English Indices of Deprivation)</li> <li>• Low-income groups &amp; employment</li> <li>• Carers</li> </ul>	<p>A Public Health England report, 'Health Matters: harmful drinking and alcohol dependence, 2016', stated that the impact of harmful drinking and alcohol dependence is much greater for those in the lowest income bracket and those experiencing the highest levels of deprivation. But the reasons for this are unclear as people on lower incomes do not tend to consume more alcohol than people from higher socio-economic groups.</p> <p>Based on data gathered from the Crime Survey for England and Wales (CSEW) that was conducted between April 2020 to March 2021, the observed prevalence of past year use (April 2020 to March 2021) of any drug was (ONS, 2022):</p> <ul style="list-style-type: none"> <li>• Higher among those unemployed (12.2%) than those economically inactive (7.9%) or employed (5.8%).</li> <li>• Higher amongst those in financial difficulty (12.8%) than those financially stable (6.7%).</li> </ul>																												

<ul style="list-style-type: none"> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	<ul style="list-style-type: none"> <li>• Lowest amongst those living in the least deprived areas.</li> </ul> <p>This data suggests those suffering deprivation or in low-income groups could be disproportionately affected.</p> <p>Data has not been collected for the other groups within this category.</p>
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### Data gaps

Data gap(s)	How will this be addressed?
There are gaps in data around disability	Users will be able to identify themselves as disabled during the consultation survey. There will be the option for free text comments so users can express any perceived or actual impact.
There are gaps in data around Gender reassignment	During the consultation there will be the option for free text comments so users can express any perceived or actual impact the PSPO may have.
There are gaps in data around marriage and civil partnership	During the consultation there will be the option for free text comments so users can express any perceived or actual impact the PSPO may have.
There are gaps in data around pregnancy and maternity	During the consultation there will be the option for free text comments so users can express any perceived or actual impact the PSPO may have.
There are gaps in data around Religion and belief, including non belief	Users will be able to confirm their religion or non-belief during the consultation survey. There will be the option for free text comments so users can express any perceived or actual impact the PSPO may have.
There are gaps in data around Sexual orientation	During the consultation there will be the option for free text comments so users can express any perceived or actual impact the PSPO may have.

## 4. Impact

Alcohol Control		
Protected group	Positive	Negative
<b>Age</b>	Potential positive impact arising from a reduction in ASB and problematic alcohol use in parks and open spaces.	<p>Enforcement is likely to impact on problematic drinkers between 36-55 years and would suggest that there is no disproportionate impact (under the proposals covered by this EINA) for residents outside this age range.</p> <p>It is important that the way the PSPO is enforced is clearly communicated to residents and park users.</p> <p>This will be ensured by:</p>

		<ul style="list-style-type: none"> <li>• Face to face communication by Parks &amp; Events Police Officers and other Staff with park and open space users.</li> <li>• Leaflets carried by Officers that explain the purpose and conditions of the PSPO and the potential consequences of breaching them.</li> <li>• Communication with the relevant Friends Groups and Management Advisory Committees that have been formed as consultative groups for these parks and open spaces.</li> <li>• Through relevant web page information.</li> </ul> <p>Outreach teams will also be involved to support the officers and provide follow up engagement for and vulnerable alcohol users who traditionally seek the company of peers to engage in problematic drinking.</p>
<p><b>Disability</b></p>	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage people with a disability to make greater use of public places.</p>	<p>The proposal if implemented could have a negative impact on some disabled people, for example those with learning difficulties or sensory impairments, who may not understand what the PSPO covers and they therefore may be more likely to have enforcement action taken against them. In order to mitigate the potential negative impacts identified above the following mitigating actions have been identified:</p> <ul style="list-style-type: none"> <li>• Officers will use their discretion over the circumstances involved in any incident, especially in the initial period of implementation, making reasonable adjustments for disabled or mentally impaired person, we are not currently aware of any drinkers who have disabilities or mental health issues .</li> <li>• A discussive, educational approach will always be taken first, and a warning given before any enforcement action.</li> <li>• There will be publicity about the launch of PSPOs and both temporary</li> </ul>

		and permanent signage used to explain the changes
<b>Sex</b>	Potential positive impact arising from a reduction in ASB and problematic alcohol use in parks and open spaces.	Enforcement data from the Police Teams suggests that males are most likely to be impacted by the introduction of a borough wide PSPO. To mitigate the impact the Council will work with drug and alcohol support agencies to offer any assistance they may be able to give to assist the cohort. Drug and alcohol services will be part of the review process of this PSPO to ensure that those who are moved have been offered intervention and support.
<b>Gender reassignment</b>	The impact of the proposal is neutral on the issue of gender reassignment	The impact of the proposal is neutral on the issue of gender reassignment
<b>Marriage and civil partnership</b>	The impact of the proposal is neutral on the issue of marriage and civil partnerships.	The impact of the proposal is neutral on the issue of marriage and civil partnerships.
<b>Pregnancy and maternity</b>	The impact of the proposal is neutral on the issue of pregnancy and maternity.	The impact of the proposal is neutral on the issue of pregnancy and maternity.
<b>Race/ethnicity</b>	Potential positive impact arising from a reduction in ASB and problematic alcohol use in parks and open spaces.	Enforcement data from the Police Teams suggests that black residents are most likely to be impacted by the introduction of a borough wide PSPO. To mitigate the impact the Council will work with drug and alcohol support agencies to offer any assistance they may be able to give to assist the cohort. Drug and alcohol services will be part of the review process of this PSPO to ensure that those who are moved have been offered intervention and support. A discussive, educational approach will always be taken by Police first, and a warning given before any enforcement action.
<b>Religion and belief, including non belief</b>	The impact of the proposal is neutral on the issue of religion and belief, including non-belief.	The impact of the proposal is neutral on the issue of religion and belief, including non-belief.
<b>Sexual orientation</b>	The impact of the proposal is neutral on the issue of sexual orientation.	The impact of the proposal is neutral on the issue of sexual orientation.
<b>Socio-economic status (to be treated as a protected characteristic)</b>	The positive impact of the proposal is neutral on the issue of socio-economic status.	Studies suggest people from low-income groups and deprived areas are more likely to be impacted by harmful drinking and alcohol dependence.

<p><b>under Section 1 of the Equality Act 2010)</b>  <b>Include the following groups:</b></p> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>		<p>A discussive, educational approach will always be taken by Police first, and a warning given before any enforcement action.</p> <p>Outreach teams will be involved to support the officers and provide follow up engagement for and vulnerable alcohol users who traditionally seek the company of peers to engage in problematic drinking.</p>
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<b>Novel Psychoactive Substances</b>		
<b>Protected group</b>	<b>Positive</b>	<b>Negative</b>
<p><b>Age</b></p>	<p>The proposal to continue the use of a PSPO to deal with NPS use in Parks and Public Spaces seeks to create safer spaces for all ages while providing opportunities for engagement with treatment and support services.</p>	<p>Previous enforcement shows it is likely to impact on individuals ages between 18-25 years and would suggest that there is no disproportionate impact (under the proposals covered by this EINA) for residents outside this age range.</p> <p>As this proposal will allow police to continue to use powers to disrupt and deter the use of NPS across the borough it is important that these powers are continued to be clearly communicated to residents and park users. This will be ensured by:</p> <ul style="list-style-type: none"> <li>• Face to face communication with park and open space users by Parks &amp; Events Police Officers and other Staff.</li> <li>• Leaflets carried by Officers that explain the purpose and conditions of the PSPO and the potential consequences of breaching them.</li> <li>• Communication with the relevant Friends Groups and Management Advisory Committees that have been</li> </ul>

		<p>formed as consultative groups for these parks and open spaces</p> <ul style="list-style-type: none"> <li>• Through relevant web page information.</li> </ul> <p>Follow up engagement with Outreach and Drug treatment providers will also be explored to ensure those vulnerable to such high-risk behaviours are made aware of the support on offer</p>
<p><b>Disability</b></p>	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage people with a disability to make greater use of public places.</p>	<p>The proposal if implemented could have a negative impact on some disabled people, for example those with learning difficulties or sensory impairments, who may not understand what the PSPO covers and they therefore may be more likely to have enforcement action taken against them. In order to mitigate the potential negative impacts identified above the following mitigating actions have been identified:</p> <ul style="list-style-type: none"> <li>• Officers will use their discretion over the circumstances involved in any incident, especially in the initial period of implementation, making reasonable adjustments for disabled or mentally impaired person, we are not currently aware of any NPS users who have disabilities or mental health issues .</li> <li>• A discussive, educational approach will always be taken first, and a warning given before any enforcement action.</li> <li>• There will be publicity about the launch of PSPOs and both temporary and permanent signage used to explain the changes</li> </ul>
<p><b>Sex</b></p>	<p>The proposal to continue the use of a PSPO to deal with NPS use in Parks and Public Spaces seeks to create safer spaces for all genders while providing opportunities for engagement with treatment and support services.</p>	<p>Previous enforcement suggests that the majority of NPS users are male, so enforcement action will likely more negatively impact on this group. To mitigate the impact the Council will work with drug and alcohol support agencies to offer any assistance they may be able to give to assist the cohort. Drug and alcohol services will be part of the review process of this PSPO to</p>

		ensure that those who are moved have been offered intervention and support. A discussive, educational approach will always be taken by Police first, and a warning given before any enforcement action.
<b>Gender reassignment</b>	The impact of the proposal is neutral on the issue of gender reassignment	The impact of the proposal is neutral on the issue of gender reassignment
<b>Marriage and civil partnership</b>	The impact of the proposal is neutral on the issue of marriage and civil partnerships.	The impact of the proposal is neutral on the issue of marriage and civil partnerships.
<b>Pregnancy and maternity</b>	The impact of the proposal is neutral on the issue of pregnancy and maternity.	The impact of the proposal is neutral on the issue of pregnancy and maternity.
<b>Race/ethnicity</b>	Potential positive impact arising from a reduction in ASB and problematic alcohol use in parks and open spaces.	Enforcement data from the Police Teams suggests that black residents are most likely to be impacted by the introduction of a borough wide PSPO. To mitigate the impact the Council will work with drug and alcohol support agencies to offer any assistance they may be able to give to assist the cohort. Drug and alcohol services will be part of the review process of this PSPO to ensure that those who are moved have been offered intervention and support. A discussive, educational approach will always be taken by Police first, and a warning given before any enforcement action.
<b>Religion and belief, including non belief</b>	The impact of the proposal is neutral on the issue of religion and belief, including non-belief.	The impact of the proposal is neutral on the issue of religion and belief, including non-belief.
<b>Sexual orientation</b>	The impact of the proposal is neutral on the issue of sexual orientation.	The impact of the proposal is neutral on the issue of sexual orientation.
<b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:</b> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> </ul>	No impact identified	Data suggests those suffering deprivation or in low-income groups could be disproportionately affected. A discussive, educational approach will always be taken by Police first, and a warning given before any enforcement action. Outreach teams will be involved to support the officers and provide follow up engagement for and vulnerable alcohol users who traditionally seek the

<ul style="list-style-type: none"> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>		<p>company of peers to engage in problematic drug taking.</p>
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<b>Dog Control</b>		
<b>Protected group</b>	<b>Positive</b>	<b>Negative</b>
<b>Age</b>	<p>Continued enforcement is likely to have a positive impact on residents and visitors of all ages.</p>	<p>Based on information on previous enforcement, DCO enforcement will impact on the 26 – 65 years age group. It is important that these conditions continue to be communicated to Official residents and park users. This will be ensured by:</p> <ul style="list-style-type: none"> <li>• Face to face communication with park and open space users by Parks &amp; Events Police Officers and other Staff.</li> <li>• Leaflets carried by Officers that explain the purpose and conditions of the PSPO and the potential consequences of breaching them.</li> <li>• Communication with the relevant Friends Groups and Management Advisory Committees that have been formed as consultative groups for these parks and open spaces.</li> <li>• Through relevant web page information.</li> </ul>
<b>Disability</b>	<p>Reducing anti-social and irresponsible behaviour and fear for personal safety may encourage people with a disability to make greater use of public places.</p>	<p>The proposal if implemented could have a negative impact on some disabled people, for example those with learning difficulties or sensory impairments, who may not understand what the PSPO covers, and they therefore may be more likely to have enforcement action taken against them. To mitigate the potential negative impacts identified above the following mitigating actions have been identified:</p> <ul style="list-style-type: none"> <li>• Officers will use their discretion over the circumstances involved in any incident, especially in the initial period</li> </ul>

		<p>of implementation, making reasonable adjustments for disabled or mentally impaired person, we are not currently aware of any dog walkers who have disabilities or mental health issues .</p> <ul style="list-style-type: none"> <li>• A discussive, educational approach will always be taken first, and a warning given before any enforcement action.</li> <li>• There will be publicity about the launch of PSPOs and both temporary and permanent signage used to explain the changes</li> </ul>
<b>Sex</b>	No impact identified	<p>Based on information on previous enforcement, DCO enforcement will impact disproportionately on females. It is important that these conditions continue to be communicated to Official residents and park users. This will be ensured by:</p> <ul style="list-style-type: none"> <li>• Face to face communication with park and open space users by Parks &amp; Events Police Officers and other Staff.</li> <li>• Leaflets carried by Officers that explain the purpose and conditions of the PSPO and the potential consequences of breaching them.</li> <li>• Communication with the relevant Friends Groups and Management Advisory Committees that have been formed as consultative groups for these parks and open spaces.</li> <li>• Through relevant web page information.</li> </ul>
<b>Gender reassignment</b>	The impact of the proposal is neutral on the issue of gender reassignment	The impact of the proposal is neutral on the issue of gender reassignment
<b>Marriage and civil partnership</b>	The impact of the proposal is neutral on the issue of marriage and civil partnerships.	The impact of the proposal is neutral on the issue of marriage and civil partnerships.
<b>Pregnancy and maternity</b>	The impact of the proposal is neutral on the issue of pregnancy and maternity.	The impact of the proposal is neutral on the issue of pregnancy and maternity.
<b>Race/ethnicity</b>	No impact identified	<p>Based on information on previous enforcement, DCO enforcement will impact disproportionately on white British groups. It is important that these conditions continue to be communicated to</p>

		<p>Official residents and park users. This will be ensured by:</p> <ul style="list-style-type: none"> <li>• Face to face communication with park and open space users by Parks &amp; Events Police Officers and other Staff.</li> <li>• Leaflets carried by Officers that explain the purpose and conditions of the PSPO and the potential consequences of breaching them.</li> <li>• Communication with the relevant Friends Groups and Management Advisory Committees that have been formed as consultative groups for these parks and open spaces.</li> <li>• Through relevant web page information.</li> </ul>
<b>Religion and belief, including non belief</b>	The impact of the proposal is neutral on the issue of religion and belief, including non-belief.	The impact of the proposal is neutral on the issue of religion and belief, including non-belief.
<b>Sexual orientation</b>	The impact of the proposal is neutral on the issue of sexual orientation.	The impact of the proposal is neutral on the issue of sexual orientation.
<p><b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b>  <b>Include the following groups:</b></p> <ul style="list-style-type: none"> <li>• Deprivation (measured by the 2019 English Indices of Deprivation)</li> <li>• Low-income groups &amp; employment</li> <li>• Carers</li> <li>• Care experienced people</li> <li>• Single parents</li> <li>• Health inequalities</li> <li>• Refugee status</li> </ul>	The impact of the proposal is neutral on the issue of socio-economic status.	The impact of the proposal is neutral on the issue of socio-economic status.

### 5. Actions to advance equality, diversity and inclusion.

Action	Lead Officer	Deadline
The EINA will be circulated as part of the consultation on the proposals and updated to reflect any additional findings.	Clare Carverhill-Rourke	June 2023

Discuss enforcement approach, tolerance levels and use of discretion with authorized officers and police.	Clare Carverhill-Rourke	Oct 2023
Undertake publicity and install signage to make residents fully aware of the changes.	Clare Carverhill-Rourke	Oct 2023
Carry out equalities monitoring of people who receive warnings / enforcement related to the PSPO during the first year of implementation, to identify if in practice a particular equality community is being disproportionately affected.	Clare Carverhill-Rourke	Oct 2024

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

Consultation planned	Date of consultation
<p>A public consultation on the proposal to implement a PSPO will take place between June and July 2023. This will be undertaken via an online survey asking for agreement, agreement with changes, disagreement, or no opinion on each individual proposal. Users will also be given the option of having a paper survey posted to them.</p> <p>We will also consult with the following organisations about the proposed PSPO:</p> <ul style="list-style-type: none"> <li>• Metropolitan Police Service</li> <li>• Mayor’s Office for Policing and Crime</li> <li>• Transport for London</li> <li>• Local Landlords and Resident Associations</li> <li>• Chamber of Commerce, Business Improvement District members</li> <li>• Wandsworth Business Action on Crime</li> <li>• Neighbourhood Watch Groups</li> <li>• Drug and Alcohol services</li> </ul> <p>With regards to the Dog Control PSPOs for parks and open spaces, the following organisations will also be consulted:</p> <ul style="list-style-type: none"> <li>• Enable Leisure &amp; Culture (who manage Wandsworth Parks)</li> <li>• Parks Friends Groups and Management Advisory Committees</li> <li>• Local community groups and societies</li> </ul> <p>Any equality considerations raised will be added to this EINA and mitigating actions considered.</p>	June – July 2023