



## Form to be used for the Full Equalities Impact Assessment

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<b>Service Area:</b> Community Services		<b>Section:</b> Community Safety	<b>Date of Initial assessment:</b> 25 <sup>th</sup> January 2019	<b>Key Person responsible for assessment:</b> Richard Adams	<b>Date assessment commenced:</b> 25 <sup>th</sup> January 2019		
<b>Name of Policy to be assessed:</b>			CEB Report: To approve the approach to setting standards of behaviour in the City Centre.				
<b>1. In what area are there concerns that the policy could have a differential impact</b>			<i>Race</i>		<i>Disability</i>		<i>Age</i>
			<i>Gender reassignment</i>		<i>Religion or Belief</i>		<i>Sexual Orientation</i>
			<i>Sex</i>		<i>Pregnancy and Maternity</i>		<i>Marriage &amp; Civil Partnership</i>
<b>Other strategic/ equalities considerations</b>			<i>Safeguarding/ Welfare of Children and vulnerable adults</i>		<i>Mental Wellbeing/ Community Resilience</i>		
<b>2. Background:</b>  Give the background information to the policy and the perceived problems with the policy which are the reason for the Impact Assessment.			<p>Oxford City Council is proposing to consult on the standards of acceptable behaviour in Oxford City Centre, and endorse the use of anti-social behaviour powers to address the issues contained in the previous City Centre Public Spaces Protection Order.</p> <p>The assessment makes due regard to whether implementation of the order will:</p> <ul style="list-style-type: none"> <li>• Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Equalities Act;</li> </ul>				

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	<ul style="list-style-type: none"> <li>• Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;</li> <li>• Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</li> </ul>
<p><b>3. Methodology and Sources of Data:</b></p> <p>The methods used to collect data and what sources of data</p>	<p>The equality impact concerns are:</p> <ol style="list-style-type: none"> <li>1. All people with protected characteristics will have an equal opportunity to engage with the consultation process.</li> <li>2. People with vulnerabilities who are committing anti-social behaviour. These vulnerabilities and all safeguarding considerations are considered on a case-by-case basis.</li> </ol>
<p><b>4. Consultation</b></p> <p>This section should outline all the consultation that has taken place on the EIA. It should include the following.</p> <ul style="list-style-type: none"> <li>• Why you carried out the consultation.</li> <li>• Details about how you went about it.</li> <li>• A summary of the replies you received from people you consulted.</li> <li>• An assessment of your proposed policy (or policy options) in the light of the responses you received.</li> <li>• A statement of what you plan to do next</li> </ul>	<p>The consultation process will ensure that the voices of residents, the business community, visitors and those that work in the city centre are included. The protected characteristics will be considered in the development of the consultation process and appropriate mechanisms used to ensure equal opportunity to engage with the process is available to all.</p> <p>When addressing anti-social behaviour by people with protected characteristics, the Council[s ASB Enforcement Policy and Corporate Enforcement Policy sets out requirements on officers to consider these issues. Safeguarding, engagement and support are key considerations in all cases, particularly those with vulnerabilities.</p>

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<p><b>5. Assessment of Impact:</b> Provide details of the assessment of the policy on the six primary equality strands. There may have been other groups or individuals that you considered. Please also consider whether the policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults</p>	<p><b>Use of legal remedies.</b> As described in the report, there are a range of existing legal remedies available to address anti-social behaviour, including Community Protection Notices (CPN), Civil Injunctions and Criminal Behaviour Orders (CBO). The legal tests for CPNs are similar to a PSPO; the behaviour needs to be detrimental, persistent and unreasonable.</p> <p>Aggressive begging, remaining in a public toilet without a reasonable excuse and urination and defecation are more likely to impact on people with vulnerabilities.</p>
<p><b>6. Consideration of Measures:</b>  This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy</p>	<p>The Council's multi-agency case management approach provides an in-depth understanding of the history and current circumstances of vulnerable people causing anti-social behaviour in the city centre. In the majority of cases this approach enables the Council and other partners to address anti-social behaviour without the need of legal remedies.</p> <p>Where multi-agency engagement and support does not address the anti-social behaviour, the Council can issue a CPN Warning with the necessary advice. Continuation of the behaviour will result in the Council determining, on a case-by-case basis, the public interest in serving a Fixed Penalty Notice or seeking a prosecution at Court and take the appropriate action.</p>
<p><b>6a. Monitoring Arrangements:</b>  Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and assessment of your monitoring, making clear whether you found any evidence of discrimination.</p>	<p>The multi-agency case management panel will continue to assess the use of all enforcement actions, first taking into consideration the support needs of the individual.</p> <p>Advice, warnings and enforcement of the PSPO will be logged in pocket notebooks and council and police databases.</p>
<p><b>7. Date reported and signed off by</b></p>	<p>January 2019</p>

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<b>City Executive Board:</b>					
<b>8. Conclusions:</b> What are your conclusions drawn from the results in terms of the policy impact		<p>A consultation on acceptable standards of behaviour in the city centre will enable people who live, work or visit the city centre to give their views. Additional efforts will be made to ensure those with protected characteristics have an equal opportunity to engage in the process.</p> <p>Use of enforcement powers to address anti-social behaviour in the city centre is governed by the Council's policies which require consideration of safeguarding and support needs of those involved in anti-social behaviour.</p>			
<b>9. Are there implications for the Service Plans?</b>	No	<b>10. Date the Service Plans will be updated</b>	April 2019	<b>11. Date copy sent to Equalities Officer in HR &amp; Facilities</b>	January 2019
<b>13. Date reported to Scrutiny and Executive Board:</b>	February 2019	<b>14. Date reported to City Executive Board:</b>	February 2019	<b>12. The date the report on EqlA will be published</b>	February 2019

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Signed (completing officer)

Signed (Lead Officer)

**Please list the team members and service areas that were involved in this process:**

Richard Adams, Service Manager