

## Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk) or phone 01223 457046.

Once you have drafted the EqIA please send this to [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk) for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, ([graham.saint@cambridge.gov.uk](mailto:graham.saint@cambridge.gov.uk) or 01223 457044).

<b>1. Title of strategy, policy, plan, project, contract or major change to your service</b>
THE CAMBRIDGE CITY COUNCIL Mill Road Cemetery, Petersfield Green and the front garden at Ditchburn Place, Cambridge PUBLIC SPACES PROTECTION ORDER 2016 (“PSPO Alcohol”)

<b>2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)</b>
<a href="#">Public Spaces Protection Orders - Cambridge City Council</a>

<b>3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?</b>
To renew the PSPO Alcohol
The purpose of this PSPO is to prohibit the consumption of alcohol or having an open container of alcohol in the three specified public spaces where local people are identified as experiencing anti-social street drinking.
By virtue of Chapter 2 of the Anti-social Behaviour, Crime and Policing Act 2014, a local authority can make a PSPO if satisfied, on reasonable grounds that the following two conditions are met:

(1) that activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried on in a public place within that area and that they will have such an effect.

(2) that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature; is, or is likely to be, such as to make the activities unreasonable; and justifies the restrictions imposed by the notice.

A consultation has been carried out about the renewal of the PSPO Alcohol with the local police, community representatives, as well as the Police and Crime Commissioner and ward councillors.

92% of respondents (22 of 24) supported the renewal of the PSPO Alcohol. Reasons included:

- Respondents witnessing evidence of alcohol consumption (drinkers and discarded alcohol containers) in the prohibited areas
- Concern that the alcohol consumption in the area would return to levels seen in the years prior to the PSPO
- Importance of the public being able to enjoy the limited green spaces in the area
- The PSPO acting as a deterrent for anti-social behaviour
- The PSPO enhancing feelings of safety in the areas it covers

A report is presented to Environment and Community Scrutiny Committee on 24 March 2022 details the responses to consultation and the main substantive issues raised during the consultation process.

#### 4. Responsible service

Community Services – Community Safety Team

#### 5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- Residents
- Visitors
- Staff

Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):

People drinking alcohol in the named places

**6. What type of strategy, policy, plan, project, contract or major change to your service is this?**

- New  
 Major change  
 Minor change

**7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)**

- Yes  
 No

If 'Yes' please provide details below:

The local policing body (constable or PCSO) and City Council's enforcement officers

**8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?**

The proposals will go to Environment and Community Scrutiny Committee on 24 March 2022.

**9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?**

Sources of data used to inform this EqIA include:

- [Cambridgeshire Insight](#)
- [Anti-social Behaviour, Crime and Policing Act 2014](#)
- [Anti-social behaviour powers - Statutory guidance for frontline professionals](#)
- [Tackling Street Drinking Police and Crime Commissioner Guidance on Best Practice](#)
- Consultation with the local policing body, relevant community representatives as well as the Police and Crime Commissioner and ward councillors.
- 92% of respondents (22 of 24) supported the extension of the PSPO. Reasons included:
  - Respondents witnessing evidence of alcohol consumption (drinkers and discarded alcohol containers) in the prohibited areas
  - Concern that the alcohol consumption in the area would return to levels seen in the years prior to the PSPO
  - Importance of the public being able to enjoy the limited green spaces in the area
  - The PSPO acting as a deterrent for ASB
  - The PSPO enhancing feelings of safety in the areas it covers

- Of the 8% (2 of 24) who did not call for the PSPO to be extended, one respondent felt unable to comment and the other responded that if the PSPO were to be discharged it should be reviewed every 12 months.
- The Council's ASB case management system showed 9 incidents of drinking on Petersfield Green between October 2019 – October 2021.
- Police reports on ASB incidents involving alcohol for the same period were low:
  - Ditchburn Place – 2 incidents
  - Mill Road Cemetery – 3 incidents
  - Petersfield Green – 16 incidents
- The range of interventions available to the Council and Community Safety Partnership to address street drinking and alcohol related disorder have an impact, but studies in previous years found that there is a group with entrenched anti-social habits who may only respond to legal remedies. The PSPO gives the police an additional tool when responding to calls of ASB related to alcohol. The police can engage in a dialogue with those displaying behaviours prohibited by the PSPO, with a breach only being issued if the individual does not agree to comply when required by the police to 1) not consume or 2) surrender their drink.

## 10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

### (a) Age - Please also consider any safeguarding issues for children and adults at risk

Ditchburn Place is a sheltered accommodation. Reduction in street drinking in the front garden of Ditchburn Place will increase the feeling of safety for the residents there. National best practice guidance shows that "older people are more likely to feel threatened by intoxicated individuals". No age-related issues have been identified for those publicly consuming alcohol in these areas.

### (b) Disability

Ditchburn Place is a sheltered accommodation. Reduction in street drinking in the front garden of Ditchburn Place will increase the feeling of safety for the residents there.

Whilst the PSPO affects anyone consuming or with an open container of alcohol in the prohibited areas, this will impact those street drinking in the city. National best practice guidance shows that street drinkers may have mental health or chronic physical health problems and are resistant to change their drinking.

**(c) Gender reassignment**

No impact has been identified specific to this protected characteristic group.

**(d) Marriage and civil partnership**

Whilst the PSPO affects anyone consuming or with an open container of alcohol in the prohibited areas, this will impact those street drinking in the city. National data shows that street drinkers are more likely to live alone.

**(e) Pregnancy and maternity**

National reports show a lower proportion of street drinkers are likely to be women and older.

**(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.**

Cambridgeshire and Peterborough Health Inequalities Strategy 2020 showed that “the rate of smoking and excessive alcohol consumption is higher among Eastern European communities” and that “1.9% of the population in Cambridgeshire and Peterborough have low English proficiency.” Whilst this data is not solely focused on the street drinking or alcohol dependent populations it gives insight into those who consume alcohol excessively.

The notice may not be understood by 1.9% of the population with low English proficiency this would be the same for any Council notice displayed solely in English.

**(g) Religion or belief**

Mill Road Cemetery is a burial space for the city centre parishes. It is maintained as a churchyard and open space. Reduction in street drinking will increase safety of those using the space to pay respects to loved ones that have died.

### **(h) Sex**

National best practice guidance shows that women are more likely to feel threatened by intoxicated individuals. A reduction in street drinking would have a positive impact on women feeling safe in Cambridge.

### **(i) Sexual orientation**

No impact has been identified specific to this protected characteristic group.

### **(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:**

- **Low-income groups or those experiencing the impacts of poverty**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: [https://media.ed.ac.uk/media/1\\_159kt25q](https://media.ed.ac.uk/media/1_159kt25q)).**

The PSPO Alcohol is aimed at addressing anti-social street drinking, which will have an impact on those in the street life community who engage in drinking.

Cambridgeshire and Peterborough Health Inequalities Strategy 2020 highlighted alcohol as one of the five conditions which contribute most to excess deaths due to socio-economic inequalities.

National best practice guidance also shows that street drinkers spend a large proportion of their income on alcohol.

### **11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)**

The Street Life Working Group (SLWG) is a multi-agency group, members include Cambridge City Council and a range of support services in the city including drug and alcohol services. The group focuses on people difficult to engage and involved in street-based ASB. The SLWG use customised action plans designed to address lifestyle choices and behaviours and to deliver the intensive work required to achieve changes, rather than a PSPO. Action plans include, but are not limited to support with substance use, treatment, health services and accommodation. This would mitigate against negative impacts on health, disability and socio-economic factors. Support services also have access to interpreters for those who do not speak English. The group look into a range of flexible support

options, bespoke to the individual being discussed i.e., those who are chronically excluded (resistant to engage with services). Enforcement options are used as a last resort by the group and can include positive requirements as well as prohibitive requirements.

Covid-19 also impacted on the presence of street drinking in these open spaces with the restrictions on groups gathering and the effect of the 'Everyone In' initiative for the homeless

The range of interventions available to the Council and Community Safety Partnership to address street drinking and alcohol-related disorder have an impact, but studies in previous years found that there is a group with entrenched anti-social habits who may only respond to legal remedies. The PSPO gives the police an additional tool when responding to calls of anti-social behaviour (ASB) related to alcohol.

The police can engage in a dialogue with those displaying behaviours prohibited by the PSPO, with the breach only being sanctioned by means of a Fixed Penalty Notice where the individual does not agree to comply when required by the police to 1) not consume or 2) surrender their drink. As such the PSPO is also an engagement tool to speak with those displaying prohibited behaviours and can be used as an opportunity to speak with them about support services.

This approach would also allow for it to be established whether the individual speaks or understands English and the signage on display. The negative impact in relation to race may be mitigated by being able to arrange for a translation of the notice, upon request in such circumstances before enforcement is used.

## 12. Do you have any additional comments?

[Click here to enter text.](#)

## 13. Sign off

Name and job title of lead officer for this equality impact assessment: Keryn Jalli,  
Community Safety Manager

Names and job titles of other assessment team members and people consulted: Tom  
Kingsley, Project Officer, Community Safety

Date of EqIA sign off: 02 March 2022

Date of next review of the equalities impact assessment: [Click here to enter text.](#)

Date to be published on Cambridge City Council website: 24 March 2022

All EqIAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer at [helen.crowther@cambridge.gov.uk](mailto:helen.crowther@cambridge.gov.uk).