

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 Kate Yerbury, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

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

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

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
Public Spaces Protection Orders - Cambridge City Council

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
To discharge the PSPO Alcohol which is due to lapse on 31 st May 2023 and instead manage anti-social drinking of alcohol via: <ul style="list-style-type: none">• The Street Life Working Group (SLWG), a multi-agency group working with 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.• The Street Life Support Officer role. In 2022, a new role of Street Life Support Officer was created within the Community Safety Team. The purpose of this role is to engage with people with a street presence who cause anti-social behaviour (ASB), including street

drinkers and link them in with appropriate support services where necessary. Whilst in the early stages of their work, the post holder has successfully engaged those with a street presence and has had a positive impact on street related ASB in the city centre. On 2nd March 2023 the Street Life Support Officer started weekly patrols of the PSPO sites. These patrols act as a deterrent to ASB, create opportunities for the officer to safely engage with street drinkers and gather evidence on anti-social drinking in the areas. The evidence can be used as a basis for interventions or where necessary, enforcement. The Street Life Support Officer will also engage the nearby support services and local interest groups.

- Community based solutions, such as the recent Environmental Improvement Programme award of £2,200 for benches at Petersfield Green - [\(3\) Two bench seats for Petersfield Green \(citizenlab.co\)](#)
- Use of Criminal Behaviour Orders (CBOs) by police to manage the behaviours of individuals causing persistent ASB. CBOs can include both prohibitive and positive conditions, such as conditions to engage in a substance abuse support service.

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.

Before considering discharge of the order the Council needs to consult with the Police and Crime Commissioner, the local policing body, relevant community representatives, ward councillors and the owner or occupier of land within the restricted area. The Council widened the scope of the PSPO consultation, by making it public. 61 people completed the consultation – this is 96% more than last year.

The consultation responses and evidence for this PSPO showed:

- The Council and Police only received 2 reports of anti-social drinking of alcohol in 2022.
- For the past 4 years the police have received less than 11 reports per year about ASB incidents involving alcohol on the PSPO sites. On average this is less than one report per month.
- 25 consultation respondents had not witnessed any anti-social drinking of alcohol on the sites covered by the PSPO in the last 12 months.
- Of the 36 respondents who had seen anti-social drinking, almost half witnessed it 10 times or less. On average this is less than one report per month.
- Of those who had seen anti-social drinking, 94% (34 people) did not report it to either the police or the council.

- Whilst 78% of consultation respondents (48 out of 61) wanted the PSPO to continue. 80% (49 of 61) supported the Council and Police managing anti-social drinking of alcohol in the ways set out in 2.4.
- 65% (194 of 300) respondents to the University of Cambridge's in person surveys did not list alcohol as a core problem facing public spaces in Cambridge.
- 62% (186 of 300) respondents to the University of Cambridge's in person surveys had never avoided public spaces in Cambridge due to experiences or perceptions of ASB. Of those who did avoid public spaces, only 5 stated alcohol as a reason for avoiding the space, 3 of those stated that areas they avoided were either outside a pub or nightclub.

The report presented to Strategy and Resources Scrutiny Committee on 27 March 2023 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
- People in supported accommodation at Ditchburn Place and Jimmy's
- Residents and businesses in the areas close to the current PSPO sites

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:

Cambridgeshire Constabulary 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 Strategy and Resources Scrutiny Committee on 27 March 2023.

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](#)
- [Living within a Public Spaces Protection Order: the impacts of policing anti-social behaviour on people experiencing street homelessness | Sheffield Hallam University \(shu.ac.uk\)](#)
- [Tackling Street Drinking Police and Crime Commissioner Guidance on Best Practice](#)
- [\(3\) Project • Alcohol Public Spaces Protection Order 2015 \(citizenlab.co\)](#)

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- 62% (186 of 300) respondents to the University of Cambridge's in person surveys had never avoided public spaces in Cambridge due to experiences or perceptions of ASB. Of those who did avoid public spaces, only 5 stated alcohol as a reason for avoiding the space, 3 of those stated that areas they avoided were either outside a pub or nightclub.

Petersfield Green is adjacent to Jimmy's which is a community-based charity providing both support and housing to people who are rough sleeping. Ditchburn Place is a supported living scheme operated by Cambridge City Council.

The Home Office guidance on PSPOs states: "PSPOs should not be used to target people based solely on the fact that someone is homeless or rough sleeping, as this in itself is unlikely to mean that such behaviour is having an unreasonably detrimental effect on the community's quality of life which justifies the restrictions imposed. It suggests the council should consider whether the use of a PSPO is the appropriate response and if it will have a detrimental impact on homeless people and rough sleepers."

In 2022, Sheffield Hallam University and the Helena Kennedy Centre for International Justice completed a report on PSPOs. The report showed that they fail to adequately tackle anti-social behaviour and that those dispersed by PSPOs simply return back later.

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. Street drinking in the front garden of Ditchburn Place can still be managed by the combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders.

National best practice guidance shows that "older people are more likely to feel threatened by intoxicated individuals". Anti-social drinking can still be managed by the combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders.

No age-related issues have been identified for those publicly consuming alcohol in these areas.

(b) Disability

Ditchburn Place is a sheltered accommodation. Street drinking in the front garden of Ditchburn Place can still be managed by the combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders.

National best practice guidance shows that street drinkers may have mental health or chronic physical health problems and are resistant to change their drinking. The new proposal will allow for more targeting interventions as opposed to a blanket approach to street drinking,

(c) Gender reassignment

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

(d) Marriage and civil partnership

National data shows that street drinkers are more likely to live alone.

(e) Pregnancy and maternity

No impact has been identified specific to this protected characteristic group

(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. Anti-social drinking of alcohol in Mill Road Cemetery can still be managed by the combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders.

(h) Sex

National research indicates that street drinkers are more likely to be male. Street drinking on the sites of the PSPO can still be managed by the combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders. This will enable support to be provided to this cohort and where enforcement is necessary for it to target the specific behaviours which as anti-social.

National best practice guidance shows that women are more likely to feel threatened by intoxicated individuals. Street drinking on the sites of the PSPO can still be managed by the combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders. 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).**

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.

The £75 fixed penalty notice attached to PSPO breach would place further financial constraints on this group, which would exacerbate the pressure already experience through the Cost of Living Crisis.

Discharging the PSPO and managing anti-social drinking through a combination of outreach, multi-agency partnership arrangements, community initiatives and criminal behaviour orders would address the ASB but reduce the financial impact on low-income groups.

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.)

To discharge the PSPO Alcohol which is due to lapse on 31st May 2023 and instead manage anti-social drinking of alcohol via:

- 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
- The Street Life Support Officer role. The purpose of this role is to engage with people with a street presence who cause anti-social behaviour (ASB), including street drinkers and link them in with appropriate support services where necessary. Whilst in the early stages of their work, the post holder has successfully engaged those with a street presence and has had a positive impact on street related ASB in the city centre. On 2nd March 2023 the Street Life Support Officer started weekly patrols of the PSPO sites. These patrols act as a deterrent to ASB, create opportunities for the officer to safely engage with street drinkers and gather evidence on anti-social drinking in the areas. The evidence can be used as a basis for interventions or where necessary, enforcement. The Street Life Support Officer will also engage the nearby support services and local interest groups.
- Community based solutions, such as the recent Environmental Improvement Programme award of £2,200 for benches at Petersfield Green - [\(3\) Two bench seats for Petersfield Green \(citizenlab.co\)](#)

- Use of Criminal Behaviour Orders (CBOs) by police to manage the behaviours of individuals causing persistent ASB. CBOs can include both prohibitive and positive conditions, such as conditions to engage in a substance abuse support service.

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 information, 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: 03/03/2023

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

Date to be published on Cambridge City Council website: 27 March 2023

All EqIAs need to be sent to the Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk