

[DRAFT] Equality Impact Assessment

1. Tell us about your service

My Directorate	Neighbourhoods
My Service	Compliance, Enforcement and Community Safety
My team / section	Anti-Social Behaviour Action Team
The name of the function being analysed	Public Spaces Protection Order to control street drinking
Who is completing the assessment?	Sara Duckett, ASB Lead
Who is the lead manager for the assessment?	Samantha Stabler, Community Safety Lead

2. Tell us about the option or activity that you're analysing

Briefly describe the main aims and objectives of your options or activity, outlining at a high level if it has implications for other areas of the Council's work and priorities.

The aim of the activity is to introduce a Public Space Protection Order in Manchester to help restrict any detrimental impacts associated with people drinking alcohol in public places such as on the street and in parks. A PSPO is one of the anti-social behaviour tools and powers. The Order can restrict certain behaviours in a public place or require people to do something to prevent a detrimental impact on others.

It is proposed that the PSPO will cover all of Manchester apart from most of the city centre where there is an existing PSPO that includes a street drinking prohibition. The city centre Order was implemented earlier this year (2021) and early indications show it is an effective tool to help manage anti-social behaviour associated with street drinking.

Evidence identifies clear links between alcohol consumption and crime and anti-social behaviour. In 2018/19, 39% of people in England and Wales said they witnessed anti-social behaviour in their local area. 11% of this anti-social behaviour was alcohol-related. 12% of people said that there is a very or fairly big problem in their area with people being drunk or rowdy in public

places [1]. In 2014-2016 in England and Wales, 91% of violent incidents which took place in or near a pub or club were alcohol-related, and 67% of those which took place in public spaces were alcohol-related [2].

The objective is for the Council and GMP to work together to prevent and tackle anti-social behaviour associated with street drinking making Manchester a safer place for everyone. Tackling crime and anti-social behaviour and reducing the crime impact caused by alcohol and drugs are key priorities for Manchester identified in the Community Safety Partnership's Community Safety Strategy. If the Order is introduced Officers will focus their engagement activity regarding the PSPO on people who they observe street drinking where there is a risk that street drinking may have a detrimental effect on the quality of life of other people. Officers will use their professional discretion to identify if the PSPO is the appropriate power at the time of the engagement.

The recommendation to introduce a PSPO has been made following engagement and consultation with partners, key stakeholders and the public. The opportunity to engage in the consultation was promoted widely through a communications and stakeholder plan. Methods of communication included social media and promotion within ward networks.

The consultation was promoted on the council's social media channels and website. Officers undertook on street engagement with members of the public to raise awareness of the consultation across Manchester and completed surveys with people who did not have access to the internet.

Through the PSPO public consultation officers found that street drinking makes people (46% of Respondents) feel unsafe in their neighbourhoods and the majority of people said the problem was ongoing. People reported feeling afraid and intimidated (32%) and people also avoided certain areas (26%) because of their concerns about street drinking. With regard to the extent that street drinking is problematic or not, 57% of Respondents said it was a major problem, 22% of Respondents said it was a minor problem and 20% of Respondent said street drinking was not a problem. 1% of Respondents did not know if street drinking was a problem.

Full details of the consultation process and rationale for recommending that a PSPO is introduced can be found at [About the street drinking Public Space Protection Order \(PSPO\) consultation | Street drinking Public Spaces Protection Order \(PSPO\) statutory consultation | Manchester City Council](#)

3. Analysing the impact on equality

Will the options being assessed here... (Tick all that apply):

Remove or minimise disadvantages suffered by individuals or groups because of their characteristics	✓
Meet the needs of people from protected or disadvantaged groups where these are different from the needs of other people	✓
Promote diversity and encourage people from protected or disadvantaged groups to participate in activities where they are underrepresented	

Describe how you've reached your conclusion and what evidence it's based on (500 words max).

Research identifies that there are certain types of anti-social behaviour that are more likely to be experienced than others. According to the analysis, the ASB types most likely to be experienced/witnessed were: street drinking/drunken behaviour (this ASB type accounted for 11.5% of those who reported experiencing/witnessing some form of ASB); groups hanging around (9.5%); inconsiderate behaviour (7.1%); and vehicle-related ASB (5.1%) [3] Living in an area of higher income deprivation and higher crime risk for longer than 12 months are factors which mean that residents are more likely to experience ASB. Therefore, it is proposed that introducing a PSPO will help to contribute to reducing alcohol related crime and anti-social behaviour in our wards with higher deprivation levels.

There is limited local and national research regarding the profile of people who street drink. Research identifies that people who street drink are more likely to be male, white British and in their 40s [4]. Officers will focus their engagement activity on the street drinking behaviour, particularly where that behaviour is contributing to anti-social behaviour, rather than targeting people because of their protected characteristics.

The health risks associated with drinking alcohol are stark. In England and Wales, data for 2017-19 shows that the alcohol specific mortality rate for England was 10 per 100,000 people and 17.3 per 100,000 for Manchester [5]. In England, there are an estimated 602,391 dependent drinkers (2018.19) [5], of whom 82% are not accessing treatment [6]. In Manchester there is an estimated 8,671 adults who are alcohol dependent, a rate of 20.4 per 1,000 population. This is higher than the estimated national rate for England which is 13.7. 23.4% of adults in Manchester are estimated to drink over 14 units of alcohol per week (the recommended safe limit for alcohol with at least 2 alcohol free days), compared to 22.8% nationally.

The proportion of dependent alcohol users not in treatment in Manchester is 85% which is higher than the proportion for England (82%.) [7] Alcohol misuse is the biggest risk factor for death, ill-health and disability among 15-49 year-olds in the UK, and the fifth biggest risk factor across all ages [8]. Implementing a city wide PSPO provides Council and Police Officers with a justified legal reason to engage with people who drink alcohol in public places which currently does not exist outside the city centre. One of the intended consequences of this is to assess needs and increase referrals into Change, Grow, Live so that the appropriate advice, support and intervention can be provided.

“Problems with drugs and alcohol can be part of a person’s spiral into homelessness. Of course, not everyone who has problems with alcohol or drugs becomes homeless and not every homeless person has problems with drug or alcohol abuse. However, levels of drug and alcohol abuse are relatively high amongst the homeless population. Being homeless is incredibly stressful. There is also a high prevalence of mental health problems amongst the homeless population. It is not uncommon for those traumatised by homelessness to seek solace in drug or alcohol.” [9] If the Order is introduced trained Officers will engage with homeless people in a sensitive and respectful manner. Officers may use their discretion when determining the most appropriate outcome of that engagement. In the city we have an excellent person centred multi-agency offer for vulnerable people through the Street Engagement Hub. People are able to seek support regarding their alcohol consumption in addition to receiving advice around issues including benefits, homelessness, health, crime and anti-social behaviour and referrals to mental health services. PSPO engagement provides an opportunity to refer people to the Street Engagement Hub for support.

Evidence suggests that lesbian, gay, bisexual and transgender (LGBT) people are more likely to be victims of crime than the general population [10]. Due to the high prevalence of alcohol featuring in crimes taking place in public places it is intended that the proposed PSPO would help contribute to keeping everyone safe including LGBT people, women and girls [11]. Similar to all the other protected characteristics and vulnerable groups considered as part of the EIA support will be offered to everyone who is found to be street drinking in the city.

Considering which group/s you have identified the options as being relevant to, complete the table below. Be brief with your answers and only complete them for the group/s relevant to your activity.

	1. What is the impact of your proposal on this group?	2. What evidence have you used to reach this assessment?	3. What actions could be taken to address the impacts?
Age (older people)	The impact on this group (50+) is positive. The PSPO will help contribute to making neighbourhoods safer for older people by preventing and tackling street drinking.	Age Friendly Manchester	N/A
Age (children and young people)	<p>The PSPO will not be enforced against children (17 years and under).</p> <p>PSPO engagement may involve 18 – 25 year olds. However, this group will not be targeted because of age. All activity will be based on who officers observe to be street drinking and the aim is to divert young people away from street drinking and anti-social behaviour through advice and support.</p>	Policy decision.	<p>If children are identified drinking alcohol in public places officers will initiate the appropriate safeguarding response.</p> <p>Explore the opportunity to improve equality monitoring related to asb interventions.</p>
Carers	There is no evidence of a disproportionate impact on carers.		
Continuing health conditions	The adverse health impacts related to drinking alcohol are identified above including the fact that 85% of people in Manchester who are alcohol dependant do not access treatment. The PSPO will be an opportunity to intervene and	See table above.	Through the engagement with the individual the officer utilises discretion about the appropriate response. The options include; advice, support referral, warning, seizing the alcohol, fixed penalty notice and / or prosecution. A balanced approach will be taken to signpost people to the relevant

	<p>refer people to appropriate support services.</p> <p>A senior officer in the Council's Population Health Team has advised that if alcohol is taken away from people who are dependent on alcohol, this will put their life in danger and could impact on emergency ambulance call outs due to seizures and unplanned hospital admissions.</p>	Population Health Team.	<p>support services to enable them to access help with problematic drinking. Officers will work with the Population Health Team and invite Change, Grow, Live to contribute to the officer training package regarding alcohol disorders, dependency and the intervention pathways. The risks associated with seizing alcohol from people who are alcohol dependent will be identified through the training.</p> <p>Explore the opportunity to improve equality monitoring related to asb interventions.</p>
Disability	<p>The evidence identifies links particularly between alcohol and mental health needs. Vulnerable people will be supported to access the relevant help and intervention.</p>	See table above.	Explore the opportunity to improve equality monitoring related to asb interventions.
Faith / religion / belief	<p>There is no evidence of a disproportionate impact on faith/religion/belief.</p>		
Families living in poverty	<p>The PSPO aims to support this group by contributing to making communities safer by tackling asb associated with street drinking.</p>	See table above.	Explore the opportunity to improve equality monitoring related to asb interventions.
Gender identity / Trans	<p>The PSPO aims to support this group by contributing to making communities safer by tackling asb associated with street drinking.</p>	See table above.	Explore the opportunity to improve equality monitoring related to asb interventions

Marriage / civil partnership	There is no evidence of a disproportionate impact on marriage / civil partnership.		
Homelessness	The PSPO aims to support this group by engaging in a positive and respectful manner. Every opportunity will be taken to signpost the individual to relevant support services including Change, Grow, Live and the Street Engagement Hub.	See table above. Officer experience of city centre PSPO activity.	Explore the opportunity to improve equality monitoring related to asb interventions
Ex-Armed Forces	There is no evidence of a disproportionate impact on ex-armed forces.		Explore the opportunity to improve equality monitoring related to asb interventions
Pregnancy / maternity	There is no evidence of a disproportionate impact on marriage / civil partnership.		Explore the opportunity to improve equality monitoring related to asb interventions
Race	There is no evidence of a disproportionate impact on race.		Explore the opportunity to improve equality monitoring related to asb interventions
Sex	Due to the evidence we have highlighted above, it is likely that the PSPO engagement will mainly be with men. Activity will be focused on people who officers observe street drinking. People will not be targeted because of their sex. The PSPO may have a positive impact on the work to ensure public places are safe for women and girls by tackling anti-social behaviour associated with street drinking.	See table above. Officer's experience of city centre PSPO engagement activity. See table above	Explore the opportunity to improve equality monitoring related to asb interventions

Sexual Orientation	The PSPO aims to support this group by contributing to making communities safer by tackling asb associated with street drinking.		Explore the opportunity to improve equality monitoring related to asb interventions
Any other (please list)			

4. Head of Service Approval

Your completed analysis needs to be signed off by your Head of Service to approve it.

Name:		Date:	
Job title:		Signature:	

Annex 1 – Actions Log

Use this table to list the actions you have identified to mitigate and adverse risks, detailing who will be responsible for completing these and setting clear timescales for delivery. Your actions will be reviewed at 6 months and 12 months to assess progress.

Actions identified in your EIA	Responsible officer / team for delivery	Timescale for delivery	Comments
Invite Change, Grow, Live to contribute to the development of the officer training package	Sara Duckett, Anti-Social Behaviour Action Team	Upon the decision being made whether or not to introduce the PSPO	
Deliver training to all officers involved in implementing the PSPO.	Sara Duckett and Ben Lough, Anti-Social Behaviour Action Team	To be completed prior to any engagement activity if an Order is introduced.	
Explore the opportunity to improve equality monitoring related to asb interventions	Sara Duckett and Samantha Stabler, Anti-Social Behaviour Action Team & Community Safety Team	To be begin if/when a decision to introduce the PSPO is taken	

References

- [1] Office for National Statistics (2019). Crime in England and Wales: Other related tables.
- [2] Office for National Statistics (2017). Overview of violent crime and sexual offences.
- [3] [Annual Report of the Victims' Commissioner 2020 to 2021](#)
- [4] Police and Crime Commissioner guidance on best practice – supporting evidence and resources (2016)
- [5] Adults Alcohol Commissioning Support Pack, 2022-23, Office of Health Disparities and Improvement.
- [6] Public Health England (2021). Public Health Dashboard.
- [7] Adults Alcohol Commissioning Support Pack, 2022-23, Office of Health Disparities and Improvement.

[8] Burton, R. et al (2016) The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies: An Evidence Review.

[9] Crisis, 'Together we will end homelessness' <https://www.crisis.org.uk/ending-homelessness/health-and-wellbeing/drugs-and-alcohol/#> (accessed 1 November 2021)

[10] National LGBT Survey: Summary Report (2019)

[11] Tackling violence against women and girls strategy, Home Office (2021)

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