

## Appendix 2 - H&F Equality Impact Analysis Tool

### Conducting an Equality Impact Analysis

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

1. **Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under this Act;**
2. **Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
3. **Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

## General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (on the intranet) or [ACAS - EIA](#). Or you can contact the councils Equalities Lead (see below)

Equality Lead  
Yvonne Okiyo (Business Partner for EDI)  
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## H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	24 / 25 Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: RENEWAL, CONSOLIDATION, AND AMENDMENT OF A PUBLIC SPACES PROTECTION ORDER (PSPO) PROHIBITING THE USE OF AMPLIFIERS IN CERTAIN PARTS OF SHEPHERDS BUSH, WHITE CITY, AND HAMMERSMITH BROADWAY</p> <p>Short summary: The Anti-Social Behaviour, Crime &amp; Policing Act 2014 allows local authorities to introduce Public Spaces Protection Orders (PSPOs). These are intended to deal with nuisances or problems in defined areas that are detrimental to the quality of life of residents and visitors, by imposing conditions on the use of that area.</p> <p>A PSPO has been proposed to renew and consolidate three separate PSPO's which prohibit amplified street noise within a defined area of Shepherds Bush, White City, and Hammersmith Broadway. In addition, it amends the PSPO to include battery powered devices in the list of prohibited amplifiers.</p>
Lead Officer	<p>Name: Barnaby Hudson</p> <p>Position: National Management Trainee, Community Safety Team</p> <p>Email: barnaby.hudson@lbhf.gov.uk</p> <p>Telephone No: 07395254761</p>
Date of completion of final EIA	25/02/2025

Section 02	Scoping of Full EIA		
Plan for completion	Timing: March 2025 Resources: Community Safety Team		
Analyse the impact of the policy, strategy, function, project, activity, or programme	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.		
	Protected characteristic	Analysis	Impact: Positive,

			Negative, Neutral
	Age	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of age.	Neutral
	Disability	The implementation of the proposed PSPO is expected to have a positive impact upon individuals with particular disabilities, especially those with a visual or hearing impairment. Part of the reason for the PSPO is concerns raised by residents and visitors with visual and hearing impairments conveying their difficulty in navigating the area due to noise levels.	Positive
	Gender reassignment	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of gender reassignment.	Neutral
	Marriage and Civil Partnership	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of marriage and civil partnership.	Neutral
	Pregnancy and maternity	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of pregnancy and maternity.	Neutral
	Race	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of race.	Neutral
	Religion/belief (including non-belief)	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of religion/belief.	Neutral
	Sex	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of sex.	Neutral
	Sexual Orientation	The implementation of the proposed PSPO will not negatively impact upon individuals on the basis of sexual orientation.	Neutral
<b>Human Rights or Children's Rights</b> If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice			

	<p>Will it affect Human Rights, as defined by the Human Rights Act 1998?</p> <p>No, legal have stated that this does not violate the rights of protesters as set out in Articles 10 and 11 of the Human Rights Act, as the PSPO does not prevent protesting in these areas using, for example, their voice.</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)?</p> <p>No</p>
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<b>Section 03</b>	<p><b>Analysis of relevant data</b></p> <p>Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.</p>
<b>Documents and data reviewed</b>	<p>The extensive consultation informed the need for the continuation of the Street Amplification PSPO. The Noise Nuisance team and Law Enforcement Officers have recorded complaints, engagement and enforcement related to the PSPO and related noise nuisance. Were this PSPO not renewed, both officers and the public believe that a return to prior levels of noise nuisance would ensue.</p> <p>The Law Enforcement Team received a total of 63 service requests in relation to amplification between January 2024 and January 2025. Of these, 29 service requests were form the Shepherd's Bush Green Ward, and 15 were for the White City ward. Note however that the areas subject to PSPO restrictions do not cover the entirety of these wards. We have considered this data, and historic data gathered for the introduction of prior amplification PSPO's, in addition to the extensive public consultation.</p>

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	<ol style="list-style-type: none"> <li>1. Public consultation took place between 19/11/2024 and 31/01/2025. The public consultation received 136 responses. We worked hard to ensure that the survey was widely circulated amongst our networks, asking partners such as the BID, SNT, and resident groups to share as widely as possible. This included circulation in monthly newsletters and on notice boards, and in weekly resident newsletters. We also attended 3 engagement events alongside the ASB team during ASB Awareness week. Further, we held 5 targeted events specifically to promote the consultation and engage residents on the PSPO, including a walkabout with Law Enforcement Officers in White City. In particular, we made sure to share the consultation with our disabled residents networks, circulating the consultation in the Action on Disability Newsletter, attended a coffee morning with AoD, and raising awareness at the Chelsea FC International Day of the Disabled event, amongst other engagement activities.</li> <li>2. The consultation analysis illustrates that residents support the restrictions, with 84%, 85%, and 89% support for Hammersmith Town Centre, Shepherd's Bush, and White City areas respectively. Moreover, when asked to comment on whether the geographical areas covered are appropriate, 83% indicated that current areas are</li> </ol>

	<p>suitable. Of the 17% who believe that current areas are not suitable, comments received indicate that the overwhelming majority of respondents who believe current areas are not appropriate, instead desired expansion of current areas rather than any reduction.</p> <ol style="list-style-type: none"> <li>3. The sole amendment to the order, aside from consolidating the areas into one PSPO, is to include battery powered devices in the list of restrictions. This amendment received 93% support, with only 5% of respondents disagreeing with the addition.</li> <li>4. It is specified within the legislation that before making a PSPO the council must consult with the chief of police for the area. This consultation has taken place and police have confirmed they are in support of the proposed Order.</li> <li>5. The Community Safety Unit also consulted with the Noise and Nuisance Team and Law Enforcement Team regarding the proposed PSPO and can confirm they fully support the proposed order.</li> <li>6. Legal, Finance, Equalities, Risk Management, Business, Procurement and Information &amp; Risk Management Officers have also been consulted on the proposed policy.</li> </ol>
<b>Analysis of consultation outcomes</b>	The proposed consolidation of the three separate street amplification PSPO's, and the addition of battery powered devices to the list of restrictions, has been presented as the recommended option. This has been done following careful consideration of consultation feedback and discussions with both internal and external teams.

<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	<p>The overall impact of the proposed order will be neutral, but positive for those with visual or hearing impairments – this is a significant aspect of the rationale behind the introduction of our first Street Amplification PSPO. During the consultation phase we worked with our Equality, Diversity, and Inclusion team in order to engage our disabled residents. We circulated our consultation to Action on Disability, one of our disabled person led organisations within the borough. In addition, we raised the profile of the consultation at a coffee morning with Action on Disability and during an event for the International Day of Disabled Persons at Chelsea FC. The response was overwhelmingly positive.</p> <p>10% of consultation respondents who completed the additional questions section indicated that they consider themselves disabled. Moreover, 2 comments were specifically made within the consultation indicating that the PSPO would have a significant benefit for them because of their particular impairments.</p>

<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
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<b>Outcome of Analysis</b>	As specified in the report, fixed penalty notices (FPN's) will only be issued if an individual continues to breach the order after being asked to desist by an authorised person. As such, any individual breaching the order will be issued with a warning and will only be issued an FPN if they knowingly continue the activity. This is to mitigate against any individual being issued with a fine as a result of them being unaware of the PSPO. Moreover, clear signage will be installed to ensure residents and visitors are aware of the PSPO restrictions.
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<b>Section 07</b>	<b>Action Plan</b>
<b>Action Plan</b>	<p><b>General actions to reduce the risk of adverse impacts on any specific groups include:</b></p> <ul style="list-style-type: none"> <li>- Clear PSPO enforcement plan and protocol to ensure the powers are being enforced appropriately and fairly.</li> <li>- PSPO enforcement plan follows an explain, engage, encourage, enforce model. This 4 'E' Model promotes transparency and ensures enforcement action is only taken as a last resort.</li> <li>- Clear training to be provided to authorised enforcement officers, including service managers and supervisors, to ensure the powers are being enforced appropriately and fairly.</li> <li>- The issuing of PSPO warnings and FPNs will be captured by Law Enforcement Officers on body worn video to ensure the safety of authorised officers and residents and to provide evidence and transparency (and enforcement monitoring).</li> <li>- Signage will also be installed across the area included in the prohibition to make individuals aware of the order. The order will also be posted on the LBHF website.</li> <li>- FPN appeals process is in place</li> </ul>

<b>Section 08</b>	<b>Agreement, publication and monitoring</b>
<b>Chief Officers' sign-off</b>	<p>Name: Neil Thurlow  Position: Director of Public Protection  Email: neil.thurlow@lbhf.gov.uk  Telephone No: 07788 380 249  Date Signed: 21/02/2025</p>
<b>Key Decision Report (if relevant)</b>	<p>Date of report to Cabinet/Cabinet Member: 10/03/2025  Key equalities issues have been included: Yes</p>
<b>Equalities Lead (where involved)</b>	<p>Name: Yvonne Okiyo  Position: Business Partner for EDI  Date advice / guidance given: 13/02/2022  Email: Yvonne.okiyo@lbhf.gov.uk  Telephone No: 07824 836 012</p>

