

## Appendix 4

# Equality Impact Assessment Templates

## Quick Guidance Notes

### Stage 1. Screening Stage

Stage 1 of the template is classed as the Screening Stage. This should always be completed. **Remember it should be an integral part of policy development not a last minute thought.**

At this stage you should be assessing obvious negative/positive impact or gaps in knowledge about likely impact. It should be a relatively short process which makes use of any previous consultation results, any differences in user satisfaction among groups, personal knowledge and experience, research, reports, existing equality data about service usage, internet searches, internal and external specialist advice, employees with previous experience of similar work, known inequalities etc. **If the likely impact on a particular group is unknown, then action should be taken to acquire this information.**

If the impact is positive (i.e. the outcome will benefit an Equality Group) then no further action is required. If no positive or negative impacts are identified then no further action is required. If the activity has the potential to cause adverse/negative impact or discriminate against different groups in the community it will require a full impact assessment (Stage 2).

In some cases it might be easy to put in place simple adjustments to eliminate any negative impact while you are working through the screening process, especially if you already have clear evidence/consultation and the process is an integral part of your policy development. It should only be done if you are absolutely confident that no other impact will be identified. If you choose to do this you should clearly document the reasons/evidence and put in place monitoring to ensure action is taken if unanticipated impact occurs.

### Stage 2. Full Equality Impact Assessment Report

Stage 2 of the EIA process guides officers through the full impact assessment process, ensuring that research/consultation with relevant equality groups has been carried out and leads to an action plan aiming to minimise the negative impact/s.

Consultation involves engaging with representatives from equality groups who are likely to be affected by the activity. It could involve engaging with employees and Members, trade unions, other public bodies, voluntary and community groups. It is important to ensure sufficient time and resources are dedicated to the consultation process to encourage full participation. You should refer to the Consultation Toolkit to ensure your consultation follows good practice. The Focus system should also be used and is able to give you information relating to other consultation activities across the council as well as existing groups/volunteers you may be able to access.

### Take a Proportionate Approach

Your approach to assessing the equalities impact of a policy, strategy or service should be proportionate to the likely impact it will have. Issues you should consider include:

- the number of people likely to be affected
- the size of the budget/amount of money involved
- the extent of the proposed change
- wider public policy implications

This means you will assess more rigorously policies which are likely to have a significant impact on the local community.

**Additional guidance notes to help you through the process are available in the Equality Impact Assessment Guidance Document.**

## Stage 1 and 2 Equality Impact Assessment Templates

Directorate: Strategy, Performance and Communications  
 Service: Community Services

Accountable Officer: Jyotsna Leney and Jess Harman  
 Telephone & e-mail: 01303 853460 / 853524

Date of assessment: 20.02.19

Names & job titles of people carrying out the assessment:

Jyotsna Leney – Community Services Manager and Jess Harman – Community Projects Manager

Name of service/function/policy etc:  Folkestone & Hythe Public Spaces Protection Order (PSPO)
Is this new or existing? New

### Stage 1: Screening Stage

#### 1. Briefly describe its aims & objectives

Folkestone & Hythe District Council is proposing to introduce a PSPO. A breach of the order is a criminal offence reported to the court or the breach being discharged through a Fixed Penalty Notice. Restrictions on the proposed behaviours may have an impact on protected characteristics or other strategic equalities considerations, in particular the safeguarding of children and vulnerable adults, mental well-being and community resilience, and disability. The impact on all factors has been considered as part of this EIA.

Folkestone & Hythe District Council has consulted on a Public Spaces Protection Order (PSPO) for specific areas within the district (consultation took place November 2018 – January 2019).

Data used to identify the types of behaviours within the proposed PSPO has come from the Council and police databases. The data indicates the number of reports from members of the public and officers who have witnessed the behaviours. Use of the PSPO powers and advice given will be recorded in writing and on partner databases. The information will be analysed to determine whether the implementation of the powers has had a disproportionate effect upon the equality factors.

PSPO's give the Council greater powers in relation to dealing with anti-social behaviour in public spaces as identified through the consultation. The PSPO contains 7 measures which are based on current information relating to antisocial behaviour and disorder.

**The measures are:**

Measure 1: *Control of alcohol consumption in a public place*  
 Measure 2: *No use of intoxicating substances in a public place*

- Measure 3: *No urinating, spitting or defecating in a public place*
- Measure 4: *No Begging*
- Measure 5: *Deterring inconsiderate Buskers*
- Measure 6: *Deterring inconsiderate Chuggers*
- Measure 7: *No unauthorised camping in open spaces*

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.

**The objectives of this PSPO fit within the vision and aims of the corporate plan. 'Investing for the next generation – delivering more of what matters'. It directly supports the Corporate Plan strategic objective 'Health Matters' and accompanying priority 'Reduce the impact of anti-social behaviour'.**

As part of the Communities Team a service priority is to - implement a new PSPO across the District based on public and member consultation linking with the corporate priorities of - Appearance Matters and Health Matters. It will help support the most vulnerable people in our communities to tackle crime and fear of crime to enable people to feel safe and secure through measures such as tackling Anti-Social Behaviour and designing out crime.

The introduction of the new Public Spaces Protection Order will create safer communities and deter and reduce crime and anti-social behaviour. PSPOs will only be used to protect communities from unwanted anti-social behaviours and shall only be enforceable where there is reasonable evidence to do so. Perpetrators of ASB will be dealt with effectively and the victims of ASB are supported. One of the key aims is to reduce antisocial street drinking and begging which have through the consultation been raised by the local community as having a detrimental effect in the area, their businesses and their lives.

The PSPO does not represent a ban on drinking, rather it allows for a greater control on drinking where it is of a problematic nature (i.e. it is accompanied by anti-social behaviour). This gives the Council and Kent Police the additional powers to tackle the problem in the designated areas where there is associated anti-social behaviour. The PSPO will look at the disruption caused by the minority and it is anticipated that the outcome will be a reduction in some of the behaviours within the PSPO and a better way of life for residents. This will also aim to reduce the demand on the Council and the Police.

All cases will be dealt with on an individual basis and the PSPO will always consider the test of 'reasonable excuse' providing an exemption from the order if the excuse for the behaviour is reasonable.

Those most vulnerable identified through the PSPO process will be offered support and sign posted to appropriate partners where necessary.

The PSPO will also support the regeneration, investment and management of areas within the district.

### It is important to note –

Following changes in the law in December 2017 guidance stated that ‘Public spaces Protection Orders **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’ (*Anti-social Behaviour, Crime and Policing Act 2014: anti-social behaviour powers. Statutory guidance for frontline professionals*, Home Office, page 51).

Folkestone & Hythe District Council therefore updated the original PSPO from June 2015 in June 2018 to remove the PSPO for rough sleeping. Therefore, this new PSPO does **NOT** target vulnerable and marginalised communities, particularly the homeless and therefore the PSPO does **NOT** explicitly criminalise rough sleeping in the identified areas.

### Measure examples –

**Measure 1** - It is currently an offence to drink alcohol in a public place in the certain areas of the district of Folkestone and Hythe if asked by a council officer/police officer not to do so. Incidents of street drinking (accompanied by anti-social behaviour) take place during the evening economy period from revellers leaving pubs and clubs, or people drinking alcohol in public areas during the day. If necessary, intervention may include signposting to a wide range of support services including GPs, rehabilitation, charities etc. Safeguarding issues are dealt with through agencies established safeguarding practices and referrals into appropriate support agencies. Anyone under-18 found drinking alcohol is committing an offence and the police will take appropriate action.

**Measure 2** – Many complaints have been received and are ongoing in terms of the common behaviours regarding the inappropriate use of public toilets which can fall into three categories: drug misuse, alcohol misuse and sleeping or suspected sexual activity. Drug users and alcoholics often have physical and mental health needs. Toilets provide facilities for a drug user including clean water, adequate lighting, warmth and privacy. FHDC cleansing staff regularly find discarded needles and alcohol containers in the toilets and there have at times been people living in the toilets. Public toilets are not a suitable place for drug users and alcoholics to use to support their addictions. They may fall unconscious or overdose. Clients have easy access to a wide range of support services including GPs, rehabilitation and charities – Rainbow Centre with “wet” facilities, nearby to some of the toilets. In addition drugs paraphernalia found in parks, gardens and alleyways etc. can cause alarm to communities however in these cases where drug users can be intervened with appropriate actions will be taken including signposting to support services. Additionally preventative work carried out in the community to dissuade people from taking drugs in the first place, pointing out the dangers and disrupting supply networks will underpin activity to address this issue as will development work to introduce additional needle drop / exchange services with a focus on public toilets.

**Measure 3** – Urination (and at times defecation) is commonly linked to the consumption of alcohol, whether in the evening economy from revellers leaving pubs and clubs, or people drinking alcohol in public areas. Toilet facilities are available for any person with an equalities consideration, whether during the day (times vary throughout the year based on

decision by FHDC Leader) through the use of public toilets or cafés and restaurants, and during the evening with pubs and clubs having to provide toilet facilities. People with very complex mental or physical health issues may have reasonable excuse, a provision built into the PSPO. This would be assessed on a case by case basis and the situation would be very rare. Urination and defecation in a public place is a public health risk.

**Measure 4** – Those individuals street begging will be discussed at the weekly CSU partners meeting and where homelessness is identified, referred to the Housing team, Porchlight Street Outreach Worker (funded by FHDC) and Multi Agency Rough Sleeper Support group to provide necessary advice and support. The support needs of each individual need to be considered including their housing situation, physical and mental health needs. Their offending behaviour should be assessed and an appropriate plan put in place to move people off the streets and into accommodation and support. Where engagement with the large number of local support services fails, enforcement action may be taken. This approach balances the needs of the individual, principally substance misuse, physical and mental health concerns, with the need to tackle anti-social behaviour, respond effectively to complaints from the public and take action against illegal activities. Research is proven to show that majority of money from begging is spent on drugs and alcohol. Very little is spent on shelter or food. Any child identified would be dealt with under the Kent Police and Council's safeguarding policies and appropriate referrals made to the Kent Children's Safeguarding Board.

**Measure 5** – The Council are not banning busking, but are planning to limit the impact of excessive and repetitive noise supported by any anti-social behaviour associated with busking which is affecting local residents, business, visitors and their quality of life. We plan to work with Council teams such as Economic Development as well as partners, Folkestone Town Council, Folkestone Town Centre Management and Folkestone Area Partnership against Crime (FAPAC) to develop a code of practice for busking and providing effective solutions in responding to particular concerns, including hours permitted, numbers in any location, and use of loudspeaker or amplification equipment. The aim is still to enhance and promote the town centre offer e.g. Through the use of relevant management agreements. We want to continue to make our town centres vibrant and safe place for all to enjoy.

**Measure 6** – The Council are not banning 'Chuggers', but are planning to limit the impact of aggressive and excessive street based fundraising/donations within certain locations, which is affecting local residents, business, visitors and their quality of life. We plan to work with Council teams such as Economic Development as well as partners, Folkestone Town Council, Folkestone Town Centre Management and Folkestone Area Partnership against Crime (FAPAC) to develop management agreement using the a code of fundraising practices protocol for fundraising/donations collections.

**Measure 7** – Many complaints have been received and are ongoing in relation to camping in public spaces which can lead to anti-social behaviour. This can include camping overnight in any vehicle or temporary structure, like a tent, without the pre-agreed approval from the landowner. Complaints are received around structures on local beaches, areas of outstanding natural beauty, local award winning parks, churchyards and other areas which are used on a regular basis by the community including families, older people etc. This measure is to address the need for an effective collaborative approach to the management of unauthorised camping in our district. In addition this measure will aim to clarify the internal working arrangements around unauthorised camping across council departments and services, so that any unauthorised camping can be managed

successfully, swiftly and without detriment to any community. This will also include partnership working with police, health, social care and charitable organisations to agree where possible how the PSPO will be used in terms of anti-social unauthorised camping. Measure 7 will not be in force to target those most vulnerable for example the homeless. Where those who are homeless can be intervened with appropriate actions will be taken including signposting to support services. Additionally preventative work carried out in the community to support the homeless and vulnerable individuals, such as weekly discussions at CSU with the support needs of each individual being considered. Where alternative and more effective legislation is available this would be considered first.

## **2. Are there external considerations? (Legislation/government directive etc.)**

PSPOs were introduced under the Anti-Social Behaviour, Crime and Policing Act 2014 allowing a local authority to introduce a series of measures into a defined locality to combat anti-social behaviour which is having a detrimental effect on the quality of life for those in the local community. This is a legal order that can last for up to three years.

Residents, visitors and staff may be affected by the outcome of the consultation exercise. However, if a PSPO is approved (following Cabinet approval), the specific client groups to be affected will include, street drinkers, street beggars, substance misusers, chuggers, street entertainers and those who camp in unauthorised spaces.

There are a vast range of tools and powers for us to respond to concerns of ASB, however used proportionately and in the right circumstances the PSPO allows the Council to counter unreasonable and persistent behaviour that affects the quality of life of residents.

The use of the PSPO can send a clear message that certain behaviours will not be tolerated and to help reassure residents that unreasonable conduct is being addressed.

Our PSPO will be carefully used alongside other approaches as part of a broad and balanced anti-social behaviour support plan. There are non-statutory solutions, which can be delivered in partnership with Community Safety Partners and other organisations.

This approach will be set out in a comprehensive protocol that will set out how the PSPO will be implemented and applied.

Where there is other more appropriate or effective legislation, or other available tools and powers which can also be used to address certain types of ASB these will be used instead of the need for applying the PSPO such as:

Community Protection Notices ( CPNs), Public Order Act, Vagrancy Act , Environmental Act , Housing Act , The Criminal Justice and Public Order Act, codes of practices around busking and the code of fundraising practices ( institute of fundraising)

In addition the LGA guidelines on PSPO's and the councils own enforcement policy sets out the approaches to be taken in the application of a PSPO including education, prevention and intervention. These will be set out in the protocol.

There are other civil powers that will be described in the protocol and the Council will look to use awareness raising campaigns, prevention and education initiatives, improved community engagement, signage, posters, as well as offering the support to those exhibiting certain behaviours which are identified as ASB under the PSPO.

FHDC will use the PSPO responsibly and proportionately, only in response to issues that cause anti-social behaviour and only where necessary to protect the public and or residents.

It is important to note that although begging is an offence under the Vagrancy Act 1824, this legislation does not provide an effective deterrent to those who engage in this activity, with courts often imposing the minimum fine

Potential displacement issues following the introduction of this PSPO will be monitored closely. Local businesses have reported that the behaviours being addressed under the PSPO have been having a detrimental on business.

Measure 2 has been introduced to address ASB linked with ingesting new psychoactive substances (NPS). The Psychoactive Substances Act 2016 introduces new legislation regarding the production and supply of NPS, but, unlike controlled drugs, does not criminalise the possession of substances alone ( unless in a custodial institution) The protocol will ensure it is clear what substances are covered or exempted ( The Psychoactive Substances Act 2016 list of substances ).

### **3. Who are the stakeholders and what are their interests?**

Implementation of a Public Spaces Protection Order requires public consultation as set out in the Anti-Social Behaviour Crime and Policing Act 2014. The consultation methodology was approved by Cabinet in November 2018. The public consultation was undertaken between November 2018 and January 2019. As a key stakeholder, the public have helped identify areas of anti-social behaviour that are having a detrimental impact on local residents and businesses quality of life.

Folkestone & Hythe District Council works closely with a broad range of agencies as we recognise there is need for support for those who have problems with mental health issues, substance misuse and homelessness.

A multi – agency approach is needed to deal with all aspects of ASB and the 7 measures covered under this PSPO. This can involve various stake holders depending on need. These could include and is not limited to:

KCC Social Services, Health Services , Mental Health Services, Kent Police, Charitable organisations such as Rainbow Centre, Porchlight, Voluntary bodies , Court liaison, internal Council departments e.g. Environmental Protection and Enforcement teams, Community Safety teams, Area Officers, Housing / homelessness service, Legal, Planning, Grounds Maintenance , Communications team and Council Members.

Political support is also important to ensure that sufficient resources will be made available to implement and enforce the PSPO throughout its duration. Final approval and sign-off of this PSPO will be undertaken by Cabinet before publication.

There needs to be commitment from partners to ensure the PSPO can be implemented effectively.

### **4. What outcomes do we want to achieve and for whom?**

The introduction of the PSPO will impact on the lives of people who live, work and visit the



district. The proposed restrictions will impact positively on people whose protective characteristics are impacted upon by the anti-social behaviour the order is designed to address. For example, young people in breach of the order will be referred through safeguarding arrangements when appropriate. Mental health considerations are assessed and referred on a case by case basis and support and early intervention is used prior to more serious enforcement action. This approach is detailed in the Council's Enforcement Policy, available on the council's website.

The PSPO will help reduce crime and antisocial behaviour in the identified areas. Outcomes will vary depending on circumstances, welfare and safeguarding issues, etc. However, it will support a reduction in ASB within the district and a reduction in any detrimental effects caused to our communities.

A robust enforcement protocol will be in place along with a referral pathway to support services, to help those that are most vulnerable as well as sign posting and support.

The welfare of vulnerable persons and victims is paramount and any risks will be identified.

#### **5. Has any consultation/research been carried out or relied upon?**

A wide and in-depth public consultation opened for 6 weeks on 26 November 2018 and closed on 21 January 2019. The consultation was carried out in a number of ways to enable the public to have maximum opportunity to comment and express their views.

This included –

- Access to all documentation and an online questionnaire via the councils website
- Access to hard copies of the documentation from all Town and parish Councils, the Council front desk and Kent Police station.
- Downloadable paper copies of the questionnaire which could be emailed or posted.
- Direct email for comments or letters via a dedicated Community Safety email address.
- Public drop in session 11 January 2019
- Dedicated communications via Facebook, twitter and the council website.
- Media including the local papers and TV publicity via BBC Sunday Politics
- Awareness raising at key meetings and events
- Dissemination through CSP/CSU and other networks

Expert legal advice was sought from a number of sources. Training given to a multi-agency audience incorporated a trawl of best practice.

Attendance at a national conference just prior to the undertaking of the consultation.

Trawling of data and relevant information from partner agencies including the police.

Evidence gather from multi – agency operations, ASB data from KCC Connects portal,

Athena as well as the Councils own M3 complaints system.

Multi-agency communications including homeless forums, weekly Community Safety unit meetings, Community Safety Partnership meetings, awareness raising and communication's to Town and Parish councils, local businesses, residents groups.

Liaised with other Local Authorities with current PSPO's locally and nationally.

Further research is being carried out to look at other powers and different ways to deal

with those likely to be affected by the PSPO avoiding the need to take to court where appropriate.

Consultation responses require some analysis. We may examine the demography of respondents to the consultation. As this can help to gauge whether they are, for example, residents or visitors, and can be useful in determining who is likely to be impacted most by either the problem behaviour or restrictions on behaviour. This will be useful in helping to shape the final Order provisions. There were large numbers of comments also made by members of the public which has yielded intelligence on locations where issues are occurring and any communications messages back to the public on the PSPO will include the need for reporting incidents through the correct channels.

**6. Are there any concerns at this stage which indicate the possibility of inequalities/negative impacts?** (Consider and identify any evidence you have - equality data relating to usage and satisfaction levels, complaints, comments, research, outcomes of review, feedback and issues raised at previous consultations, known inequalities) If so please provide details.

The introduction of the PSPO will impact on the lives of people who live, work and visit the district. The proposed restrictions will impact positively on people whose protective characteristics are impacted upon by the anti-social behaviour the order is designed to address. For example, pregnant women and disabled people can be denied access to facilities they need such as the public toilets which may contain drug paraphernalia or substance misusers. Young people in breach of the order will be referred through safeguarding arrangements when appropriate. Mental health considerations are assessed on a case by case basis and support and early intervention is used prior to more serious enforcement action.

Restrictions on the proposed behaviours may have an impact on protected characteristics or other strategic equalities considerations, in particular the safeguarding of children and vulnerable adults mental well-being and community resilience and disability. The impact on all factors has been considered.

The assessment makes due regard to whether implementation of the order will:

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

**7. Could a particular protected characteristic be affected differently in either a negative or positive way? (Positive – it could benefit, Negative – it could disadvantage, Neutral – neither positive nor negative impact or Not sure?)**

	<b>Type of impact, reason &amp; any evidence</b>
Disability	Positive – we would address any disability concerns and put additional support measures in place if required through prevention, education and sign posting to relevant services.

	<p>Under 16's will be referred into safeguarding mechanisms and parents/guardians will be spoken with where necessary.</p> <p>Areas will improve in terms of access for those with disabilities.</p>
Race (including Gypsy & Traveller)	<p>Positive - all members of the community are treated fairly and equally regardless of race</p> <p>Neutral – the protocol seeks to ensure that minimum disruption is caused to both the settled community and Gypsies and Travellers whilst ensuring that everyone's rights are respected, and that the legal processes are adhered to.</p> <p>Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p>
Age	<p>Positive - all members of the community are treated fairly and equally regardless of age</p> <p>Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p> <p>Young People – will be referred into safeguarding mechanisms and under 18's parents/guardians will be spoken with.</p>
Gender	<p>Positive - all members of the community are treated fairly regardless of gender</p> <p>Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p>
Transgender	<p>Positive - all members of the community are treated fairly and equally regardless of whether they are transgender</p> <p>Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p>
Sexual Orientation	<p>Positive - all members of the community are treated fairly and equally regardless of sexual orientation</p> <p>Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p>
Religion/Belief	<p>Positive - all members of the community are treated fairly and equally regardless of religion or belief</p> <p>Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p>
Pregnancy & Maternity	<p>Positive – this would be picked up in any welfare assessment carried out they will be referred into safeguarding mechanisms. Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.</p> <p>Areas will improve in terms of access for those pregnant or with</p>

	infants – access to cleaner areas.
Marriage/ Civil Partnership Status	Positive - all members of the community are treated fairly and equally Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.

**8. Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?**

<b>Homeless</b>	For these vulnerable groups where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.  Where persistent ASB is being committed by any of these vulnerable groups they would be a priority at CSU meetings under – High risk and vulnerable persons and would have additional target support through this forum to enable a holistic, multi-agency interventions to be applied when dealing with these groups in terms of any further actions for the committed ASB.
<b>Ex-Offenders</b>	
<b>Substance misusers</b>	
<b>UASC</b>	
<b>MISPERS</b>	
<b>Migrants</b>	
<b>Mental Health</b>	

**9. Are there any human rights implications?**

The rights of individuals will be respected and all practices carried out lawfully with robust arrangements for support services, interventions, sign posting referrals and welfare assessment with provision of appropriate support as necessary.

**10. Is there an opportunity to promote equality and/or good community relations?**

Yes –The PSPO can show the improvement to the quality of life for those directly affected by the ASB which will include addressing the needs of those most vulnerable both committing the ASB and affected by the ASB (victims).

Provision of advice and information on support services.

Seeking alternative solutions to the issue of an FPN where appropriate.

**11. If you have indicated a negative impact for any group is that impact legal? (not discriminatory under anti-discrimination legislation)**

N/A

**12. Is any part of this policy/service to be carried out wholly or partly by contractors?**

Yes

Use of Bailiffs or other services for removing unauthorised vehicles/structures should

measure 7 come into play after being issued with an FPN and after support (including welfare checks) has been offered.

**Please note that normally you should proceed to a Stage 2: Full Equality Impact Assessment Report if you have identified actual, or the potential to cause, adverse impact or discrimination against different groups in the community. (Refer to Quick Guidance Notes at front of template document)**

**13. Is a Stage 2: Full Equality Impact Assessment Report required?**

No

The protocol provides for a fair and consistent service and helps the public and those affected to understand the laws relating to our PSPO and ASB and developments that can affect anyone.

**14. Date by which Stage 2 is to be completed and actions**

N/A

**Please complete**

We are satisfied that an initial screening has been carried out and a full impact assessment **is /is not required\*** (please delete as appropriate).

Completed by: Jyotsna Leney & Jess Harman Date: 22/02/2019

Role: Community Services Manager and Community Projects Manager



Countersigned by Head of Service

Date: 26/02/19

*Please keep the signed hard copy with your team for auditing purposes and forward an electronic copy to [gavin.edwards@folkestone-hythe.gov.uk](mailto:gavin.edwards@folkestone-hythe.gov.uk) so that it can be published.*