

Appendix: 1

Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
Title of service or policy	<p>Public Spaces Protection Order to control dogs off leads and defecation (related to anti-social behaviour) in the below itemised cemeteries.</p> <p>Locksbrook Cemetery, Upper Bristol Road, Bath, BA1 3DQ</p> <p>Harptree Cemetery, West Harptree Road, East Harptree, Somerset, BS40 6BQ</p> <p>St. Michael's Cemetery, St. Michael's Road, Lower Weston, Bath, BA1 3BJ</p> <p>Smallcombe Cemetery, 6 Widcombe Hill, Bath, BA2 6DD</p> <p>St. James Cemetery, Lower Bristol Road, Bath, BA2 3BQ</p> <p>Twerton Cemetery, Bellotts Rd, Bath, BA2 3RT</p>

Name of directorate and service	PLACE – Bereavement Services
Name and role of officers completing the EqIA	Vincent Young – Bereavement Services Manager
Date of assessment	23/04/2025

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website following relevant service lead approval.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> How the service/policy is delivered and by whom 	The Anti-social Behaviour, Crime and Policing Act 2014 created a range of new powers to deal with antisocial behaviour including the Public Spaces protection Order (PSPO).

<ul style="list-style-type: none"> ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>Purpose of a PSPO:</p> <ul style="list-style-type: none"> ● Designed to stop people committing anti-social behaviour in a public space. ● To address behaviour having or likely to have a detrimental effect on quality of life. ● The behaviour must be persistent or continuing in nature. <p>Bereavement Services oversee the maintenance of the aforementioned Cemeteries including grass cutting, hedge trimming, minor tree trimming and set aside land for biodiversity. They also facilitate interments in existing graves should there be available space for further burials.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>Under the PSPO the police officer or accredited person is empowered to enforce a ‘<i>dogs on leads</i>’ regulation where the conditions above apply. Failure to comply with such a request made by a police officer is an arrestable offence punishable by a fine.</p> <p>These cemeteries are owned by the Council and which we are obligated to maintain in an appropriate manner. Along with ensuring access to the cemetery is available throughout the day for members of the public. This clearly acknowledges our commitment to be an inclusive authority and one which does not disadvantage any group or people with protected characteristics.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The aims of this policy align with the Council’s strategic priorities, including:</p> <ul style="list-style-type: none"> • Giving People a Bigger Say • Delivering for Local Residents • Preparing for the Future • Focusing on Prevention

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p>	<ul style="list-style-type: none"> ● Avon and Somerset Police Inclusion and Diversity Plan 2019-2024. ● Member of the National Equalities Standard (NES) ● Disability Confident Employer ● Corporate Equalities Training ● Relevant staff have completed Neurodiversity Training too.
<p>2.2 What is the equality profile of service users?</p>	<p>By virtue of the service that is offered through Bereavement Services – it is likely that the equalities profile of our service users will be extremely diverse. Although it is not feasible to accurately identify the characteristics of each user.</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>There are no customer surveys which relate to these Cemeteries.</p>
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>A full Public Consultation will take place at the appropriate time during the Public Spaces Protection Order application process with all stakeholders, including statutory consultees and residents. The PSPO proposal will be created with a view to restrict dog walkers to ensure their dogs are kept on their leads at all times whilst visiting the cemeteries.</p> <p>This is intended to:</p> <ul style="list-style-type: none"> ● Maintain the dignity of the deceased ● Reduce uncleared defecation ● Protect other visitors ● Safeguard dogs and Council employees, particularly when machinery is in use.
<p>2.5 If you are planning to undertake any consultation in the future regarding this service or</p>	<p>The PSPO proposal with regards to dogs on leads should not discriminate against those with protected characteristics and if anything could enhance the wellbeing of some people within this category.</p>

<p>policy, how will you include equality considerations within this?</p>	<p>A public consultation will be conducted. All residents and stakeholders will have the opportunity to engage in the consultation process. The consultation process will assist in identifying any groups with shared protected characteristics which the PSPO may have a disproportionate impact on. We will ensure our consultation survey includes equality monitoring. Consultation materials and surveys will be available on request in a range of formats to accommodate different needs, such as large print and easy read.</p> <p>The consultation process will be considerate of accessible needs. Paper copies are available on request in One Stop Shops. A central phone number, postal and email address will be available in addition to online consultation process. Alternative formats will be available on request or pre-planned where we are aware of individual need.</p>
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3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
<p>3.1 Issues relating to all groups and protected characteristics</p>	<p>Bereavement services recognise the importance of delivering individualised services to the public in a sensitive and responsive way. This by way of definition</p>	<p>Rather than targeting specific individuals, PSPOs focus on the identified problem or behaviour in a specific location. Enforcement is based solely on the</p>

	<p>means that we cater for all groups and people with protected characteristics.</p> <p>PSPO's help control anti-social behaviour and provide councils with the ability to tackle the issue by providing an authorised officer to enforce against a list of specified anti-social behaviours.</p> <p>PSPO's can be a positive device that help to prevent anti-social behaviour and can provide an effective response to some of the issues local residents face on a daily basis.</p> <p>A PSPO is likely to enhance the area in terms of improving the environment and reducing fear of ASB. These positive outcomes have helped foster good relations between communities.</p>	<p>restricted activity, not personal characteristics.</p> <p>B&NES Council does not expect enforcement officers' actions to be influenced by bias; the treatment and process of applying for a PSPO is solely focused on the restricted activities.</p> <p>Avon & Somerset police are governed by the Code of ethics Ethical policing principles College of Policing and the Equality Act. They are fully certified for the National Equality Standard and have achieved the NES compliant</p>
<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>Safe spaces - women are significantly more likely than men to say they feel unsafe in their area after dark, and therefore this group may feel safer to be in an area where PSPO's are implemented.</p> <p>To ensure the PSPOs do not disproportionately impact one sex, the decision to take enforcement action will not be based on the sex of the</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by a person's sex; the treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>The PSPO will assist in creating a safer environment</p>

	perpetrator of the anti-social behaviour. Decisions will be made on the anti-social behaviour taking place and the impact this has on others. PSPOs will assist in creating a safer and cleaner environment and positively impact on both males and females.	
3.3 Pregnancy and maternity	PSPOs would positively impact by virtue of being in an environment with less ASB.	<p>B&NES Council does not expect enforcement officers' actions to be influenced by pregnancy or maternity; the treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>The police are trained to be able to identify and assess situations they may encounter and to identify any present risk in order that they may ensure that they react appropriately in any situation.</p>
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	Transgender people or people undertaking gender reassignment may feel safer in an environment where PSPO's are in place.	<p>No known negative Impacts.</p> <p>B&NES Council does not expect enforcement officers' actions to be influenced by gender reassignment. PSPO is solely focused on the restricted activities.</p>
3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)	Disabled residents are often more vulnerable and may feel safer in an environment where PSPOs are in place.	The council does not expect enforcement officers' actions to be influenced by a disability; the treatment and process of applying a PSPO is solely focused on the restricted activities. Avon & Somerset police are a disability confident employer and work to challenge and change

		<p>attitudes towards disabled people, providing support and removing barriers.</p> <p>Signs are erected around the area designated by the PSPO to ensure that people entering the area are advised that they are in a PSPO designated area. It is recognised that there may be individuals who for a variety of reasons may not be able to read or fully understand the wording on the signage.</p> <p>The Police recognise the need for clarity when dealing with people who may be infringing the terms of the PSPO.</p> <p>Where enforcement of a PSPO is taking place, considerations will need to be taken regarding disabled people who are neurodivergent and or with learning difficulties as they may need time to process information and respond & react accordingly. Within the police toolkits would be the use of appropriate adults, advocates/ interpreters including BSL. Follow-up activity would take place with those who support the individual.</p> <p>All dogs, including assistance dogs, must be kept on a lead at all times, this is to ensure the safety of the animal and for others using the space.</p>
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<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>PSPOs will contribute to a safer environment for all age groups.</p> <p>Elderly people and children may feel safer in an environment where PSPOs are in place.</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by a person's age; the treatment and process of applying for a PSPO is solely focused on the restricted activities.</p> <p>The police are trained to be able to identify and assess situations they may encounter and to identify any present risk in order that they may ensure that they react appropriately in any situation.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>Facilities are inclusive and accessible to all people and is respectful of all ethnicities.</p> <p>Translation services are available on request for individuals.</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by a person's ethnicity; the treatment and process of applying for a PSPO is solely focused on the restricted activities.</p> <p>Avon & Somerset police are governed by the Code of ethics Ethical policing principles College of Policing and the Equality Act. They are fully certified for the National Equality Standard and have achieved the NES compliant accreditation for best practice in Equality, Diversity, and Inclusion .As such they aim to ensure greater dignity, fairness and respect in treatment and outcomes, tackling prejudice, unintended bias and reducing inequalities in service delivery.</p>

<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</p>	<p>The PSPO should have a positive impact on residents regardless of their sexual orientation.</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by a person's sexual orientation; the treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>No known negative Impacts</p>
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>PSPOs should have a positive impact on all residents regardless of their married or civil partnership status by reducing anti-social behaviour.</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by a person's marital status; the treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>No known negative Impacts</p>
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>PSPOs should have a positive impact on all residents regardless of their religion/belief by reducing crime and anti-social behaviour.</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by religion/ belief; the treatment and process of applying a PSPO is solely focused on the restricted activities.</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>PSPOs seek to ensure the designated areas remain safe places to live, visit and work. This has a positive impact on society as well as helping to assist the vibrancy and economy of the areas. PSPOs should have a positive impact on all residents by reducing crime and anti-social behaviour.</p>	<p>B&NES Council does not expect enforcement officers' actions to be influenced by anyone's socio-economic status; the treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>No known negative Impacts</p>

<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>PSPOs should have a positive impact on all residents regardless of their religion/belief by reducing crime and anti-social behaviour.</p>	<p>The treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>No known negative Impacts</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>B&NES Council does not expect enforcement officers' actions to unduly impact on the armed forces community.</p>	<p>The treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>No known negative Impacts</p>
<p>3.14 Care Experienced *** This working definition is currently under review and therefore subject to change:</p> <p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	<p>PSPOs should have a positive impact on all residents by reducing anti-social behaviour.</p>	<p>The treatment and process of applying a PSPO is solely focused on the restricted activities.</p> <p>No known negative Impacts</p>

*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by: Chris Major
Date: 26/11/2025

(Divisional Director or nominated senior officer)