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**REPORT FOR: CABINET**

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**Date of Meeting:** 15 June 2017

**Subject:** Approval of a Borough Wide Public Spaces Protection Order to address environmental issues

**Key Decision:** Yes

**Responsible Officer:** Tom McCourt, Corporate Director of Community

**Portfolio Holder:** Councillor Graham Henson, Portfolio Holder for Environment

**Exempt:** No

**Decision subject to Call-in:** Yes

**Wards affected:** All

**Enclosures:** **Appendix A1 to A3** – Consultation Responses  
**Appendix B** - Proposed Public Spaces Protection Order  
**Appendix C** –Police Statement re Alcohol Exclusion Zone  
**Appendix D** – Proposed Public Notice  
**Appendix E** – Equality Impact Assessment (EQIA)

## **Section 1 – Summary and Recommendations**

This report proposes to introduce a Borough wide Public Spaces Protection Order (PSPO), as set out under the Anti-Social Behaviour, Crime and Policing Act 2014, to address matters of Anti-Social Behaviour (defined as anything that can cause harassment, nuisance and / or annoyance) that affect the Borough

### **Recommendations:**

Cabinet is asked to:

1. Revoke the current Designated Public Places Order regarding alcohol exclusion with effect from 1<sup>st</sup> July 2017
2. Approve the Public Spaces Protection Order (Borough Wide) (Harrow Council) 2017 with effect from 1<sup>st</sup> July 2017

### **Reason: (For recommendation)**

The PSPO would allow direct action against low level anti-social behaviour, with the benefit of being able to issue fixed penalty notices for breaches, if appropriate.

## **Section 2 – Report**

### **Introduction**

Harrow Council (“The Council”) is committed to maintaining a clean and safe environment for the benefit of everyone in the borough. The commitment recognises the Council’s responsibility to keep the streets and local environment clear of litter and obstructions and deal with other local environmental quality issues including anti-social behaviour. In addition this commitment forms a key part of the council’s published priorities include Build a Better Harrow. The proposal to adopt a borough-wide PSPO is in line with this priority. In particular, in tackling matters of crime and anti-social behaviour, which includes matters that cause harassment, annoyance and / or nuisance. The Council knows that the majority of those who live, work and visit the borough do keep the area clean; however, it wants to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment.

In March 2014, the Anti-Social Behaviour, Crime and Policing Act 2014 came into force, with commencement of various provisions staggered. One of the

aims of the legislation is to enable intervention before something becomes a bigger problem.

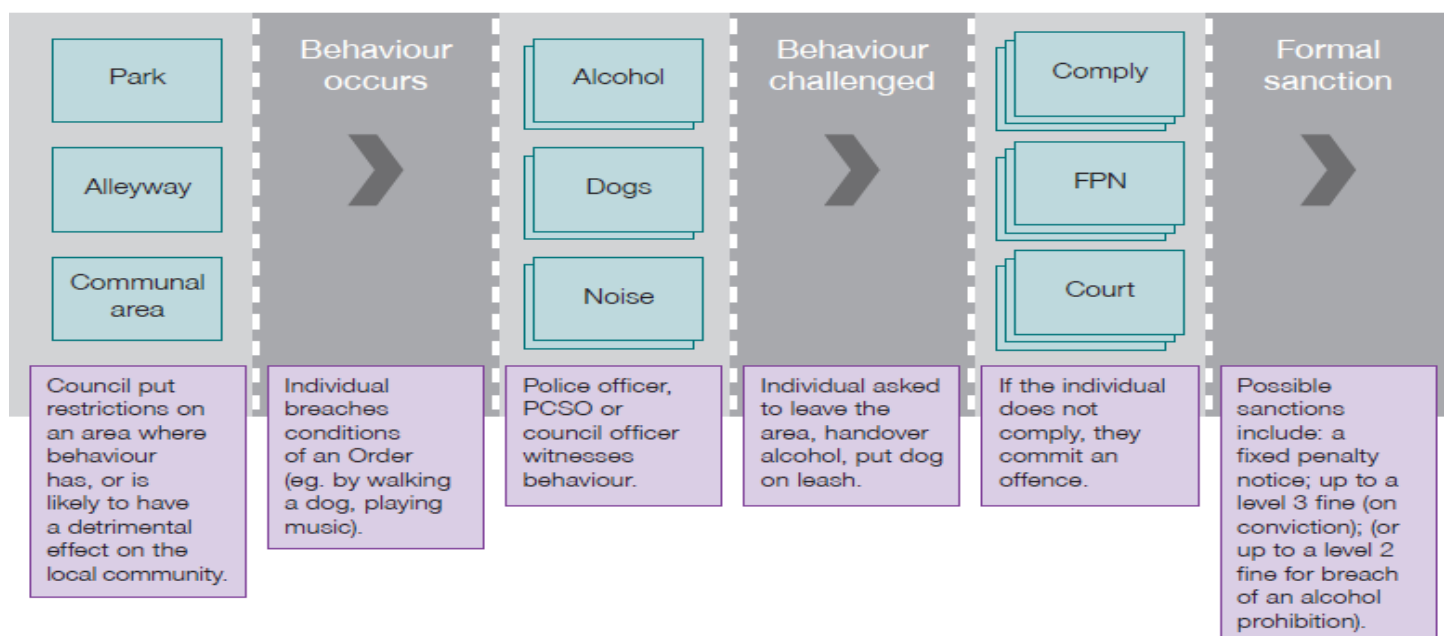
Included within the legislation is the power to put in place a Public Spaces Protection Order, details of which are provided below. In November 2015, Cabinet granted the Corporate Director of Community authority to approve any PSPO affecting up to three bordering wards following consultation with the Portfolio Holder<sup>1</sup>. Proposed PSPOs falling outside of this limitation, such as the one subject of this report, need Cabinet approval.

## Public Spaces Protection Orders

Public Spaces Protection Orders provide a power to deal with particular nuisance or problems that directly affect an area.

An overview of the process is shown below, taken directly from the Official Guidance that accompanies the legislation.

### Public spaces protection order



In February 2015, Cabinet approved the use of Fixed Penalty Notices as an option in relation to Community Protection Notices and Public Spaces Protection Orders. These are set at £100 with no discount

## Proposed Borough Wide PSPO

What are the activities that the proposed PSPO seeks to address?

<sup>1</sup> <http://modern.gov:8080/ie/ListDocuments.aspx?CIId=249&MIId=62618&Ver=4>

- The PSPO being proposed takes into account the current borough wide Designated Public Place Order – more often referred to as the Alcohol Control Zone

In addition the PSPO seeks to address the following activities by creating new offences in respect of them:

- Prohibiting urinating, defecating and spitting in any public place in the Borough;
- A duty requiring that any persons walking a dog must have the means to pick up dog faeces. This requirement will ensure that dog walkers must carry a receptacle for this purpose;
- If a dog defecates at any time on land to which the Order applies and a person who is in charge of the dog at that time fails to remove the faeces from the land forthwith, they are committing an offence;
- Prohibiting smoking in children's play areas;
- Driving over footpaths, footways and verges on land controlled or owned by the Authority.

**All these new powers, if introduced, will be subject to a communications campaign to raise awareness and aid in educating all, as the intention is to change behaviour and lead to compliance, rather than seeking continual enforcement.**

### **Alcohol Control Zone**

The Council introduced a Borough Wide Designated Public Places Order (DPPO) on 23<sup>rd</sup> June 2008, making the Borough a controlled drinking zone. The effect of this was to make it an offence to continue to drink alcohol when asked not to do so by a Police Officer, or to refuse to surrender any alcohol to an Officer. Failure to comply may lead to arrest and a fine. The power to create a DPPO was introduced by the Criminal Justice and Police Act 2001.

With the introduction of the Anti-Social Behaviour, Crime and Policing Act 2014, pre-existing designated public place orders will be subject to the provisions of the 2014 Act. It is therefore considered appropriate to consider replacing the existing DPPO now with a PSPO that can cover a wider range of issues. The Police have also provided a statement in support of this in Appendix C.

### **Spitting**

In 2014, a survey was conducted on the Council website regarding taking action against spitting, showing support of over 3000 people.

Spitting itself is an emotive issue and one that residents of Harrow support in terms of strong enforcement. Spitting would only be allowed in public space if there is "reasonable excuse" or if carried out into a handkerchief, tissue, bin or other suitable receptacle.

## **Urination and Defecation**

With regards urination and defecation, the Crown Prosecution Service (CPS) does not classify urinating in the street as a basic offence that would fall under Section 5 of the Public Order Act 1986<sup>2</sup>, enforced by the Police. However urination in the street can be part of a drunk and disorderly offence, but the offence must also include evidence of abusive language or disorderly behaviour. Urination alone is not enough for either offence<sup>3</sup>.

In recent times, Harrow has seen a rise in the use of park and other open areas for transient population leading to complaints of urination and defecation within these areas. There is limited action that can currently be taken to address this, hence the inclusion in the proposed PSPO of offences in respect of both urination and defecation. This would also allow Police greater powers to tackle such anti-social behaviour.

## **Dog Fouling**

With the introduction of the Anti-Social Behaviour, Crime and Policing Act 2014, previous dog control orders (which included addressing dog fouling) were replaced by the use of Public Spaces Protection Orders. The Council has not previously introduced any dog control order.

It is an emotive subject, and while the majority of dog owners are responsible in their approach, unfortunately it still remains an issue. Keep Britain Tidy have shown that 4 out of 10 people surveyed nationally in 2016 believe dog fouling to be an issue in their area, and 1 in 5 recreational areas suffer from constant issues of dog fouling. This is supported in the consultation, with 37% of responders stating it is an issue they see frequently.

Dog fouling is often seen as one of the most offensive types of nuisance anti-social behaviour, affecting parks and streets. Dog excrement is also a public health risk, with the potential to lead to blindness from an infection called *Toxocara canis*. No person using the streets or parks of Harrow should have to worry about this risk of infection.

The Council is therefore looking at a double approach to this aspect using the proposed Public Spaces Protection Order, being the offence of allowing a dog to foul and not clearing it up, as well as not having the suitable means to pick it up. This is consistent with neighbouring Boroughs, who have adopted such provisions for a number of years (e.g. Hillingdon)

## **Smoking in Children's Play Areas**

The very nature of these areas is for children to play safely, enjoy exercise, have fun, without the risk of detriment to their health. The Council, as part of its priority of making a difference to families, communities and the vulnerable, needs to take steps to protect children from unnecessary risks to health. This is particularly true in areas provided by the Council in their green areas.

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<sup>2</sup> [www.cps.gov.uk/legal/p\\_to\\_r/publi\\_order\\_offences](http://www.cps.gov.uk/legal/p_to_r/publi_order_offences)

<sup>3</sup> [http://www.met.police.uk/foi/pdfs/disclosure\\_2015/may\\_2015/2015010000731.pdf](http://www.met.police.uk/foi/pdfs/disclosure_2015/may_2015/2015010000731.pdf)

To this end, the proposed Public Spaces Protection Order seeks to stop smoking in play areas, to remove the risk of second hand smoke as well as marking these areas as ones reserved for enjoyment and health. This is in line with the Chief Medical Officer view on such spaces, Chartered Institute of Environmental Health and the Royal Society of Public Health report on smokefree communities<sup>4</sup>

The move to ban smoking in children's play areas is one being adopted across a range of councils including Leicester and Norwich. The London Borough of Hackney introduced a ban on smoking in its biggest park in 2011, and a similar scheme was introduced in Sutton in 2009.

### **Driving over footpaths, footways and verges on land owned or controlled by the Council**

Driving over a verge occurs throughout the Borough, with limited action viable by the Council. It often damages the verge, which not only spoils the appearance of the street, but involves the Council in unnecessary additional expense in making good the damage. The Highways section of the Council has calculated that an average road in Harrow will have around 2.5% of footway being illegally used as vehicle cross overs so approximate cost to the borough could be up to £2,648,351.68 annually including Officer time and repairs. The Council has a statutory obligation to maintain and keep the highway (including such verges and footpaths) in a basic safe and accessible condition.

As it currently stands, enforcement can only take place if it can be directly shown that a vehicle has caused damage to the verge / footpath. But the added difficulty at present is that Officers have to demonstrate that such damage is linked to a particular vehicle / premise before any action (e.g. cost recovery) is feasible. The mere presence of a car in a drive next to a damaged verge or on the highway next to it is not proof that this car caused the damage.

By introducing this element to the Public Spaces Protection Order, it provides officers with a far more straight forward approach to ensuring verges, footpaths and footways are not damaged and not causing nuisance or risk. While concentration will be placed on those areas where damage is being caused, where it is not feasible to attribute damage to any one person / vehicle, action will still be feasible where it is shown a vehicle has gone over these areas (e.g. car in the drive where there is no dropped kerb)

### **What are the requirements for making a PSPO?**

The ASB, Crime and Policing Act 2014, Section 59 sets out the conditions that need to be met for a PSPO to be made.

The first condition is that:

- (a) 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
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- (b) It is likely that the activities will be carried on in a public place within that area and that they will have such an effect.

The second condition is that the effect, or likely effect, of the activities:

- (a) Is, or is likely to be, of a persistent or continuing nature,
- (b) Is, or is likely to be, such as to make the activities unreasonable, and
- (c) Justifies the restrictions imposed by the notice

The only prohibitions or requirements that may be imposed are ones that are reasonable to impose in order:

- (a) To prevent the detrimental effect referred to in the first condition above
- (b) To reduce the detrimental effect or to reduce the risk of its continuance, occurrence or recurrence

### **How will the PSPO be enforced?**

Failure to comply with a PSPO is an offence and can lead to a summary conviction and fine not exceeding level 3 on the standard scale (save for offences relating to alcohol consumption, which are liable to a fine not exceeding level 2). In February 2015, the Council agreed that a Fixed Penalty (FPN) of £100 could be applied to any non-compliance with a PSPO if appropriate, rather than a prosecution. However, for repeat offenders or in cases where it is believed the issuing of a FPN would not deter future breaches, or if the offender fails to pay the FPN, a prosecution may be commenced. A person authorised by the Council, a Police Officer and / or a Police Community Support Officer (PCSO) if authorised can enforce the PSPO.

### **How will the PSPO be advertised?**

If the Order is put in place then information will go on the Council Website, be published in the local newspapers, signage will be erected in relevant areas and through use of other methods to maximise publicity of the Order. This will include working with partners including Police, Community Champions and Park Groups.

### **How long will the PSPO last?**

Any PSPO can last a maximum of 3 years, although it can be extended if necessary, and/or reviewed (and varied or discharged) during the course of its life. In this case, the proposed PSPO is sought for 3 years.

### **Will it work?**

The existing alcohol control zone (DPPO as referred to earlier) has proved to be a useful tool for Police in tackling issues (see Appendix C) and the use of orders around the other aspects for which the PSPO is sought has been successful when used by other Councils. It will allow a more efficient enforcement regime and consistent message across the Borough.

## Options considered

In relation to the recommendation in this report, the main options include:

**1. Cabinet approve the Public Spaces Protection Order (Borough Wide) (Harrow Council) 2017 (as drafted in Appendix B)**

This would result in all aspects of the proposed PSPO coming into force for a duration of 3 years.

This is the preferred option and is supported by the consultations carried out as set out in Appendix A to this report.

**2. Cabinet approve some aspects of the Public Spaces Protection Order (Borough Wide) (Harrow Council) 2017 (as drafted in Appendix B)**

Where Cabinet does not agree with all the proposals, these can be removed or amended. Additionally, Cabinet can choose a shorter period for the PSPO.

**3. Cabinet does not approve the Public Spaces Protection Order (as drafted in Appendix B)**

By choosing this option, the Council will rely on current provisions, if any, to seek to achieve the same outcomes. However, for reasons noted in this report, it is felt that with the exception of the Alcohol Control Zone, there are inadequate or no provisions for dealing with the other issues that the proposed PSPO seeks to tackle. For example, in the case of dog fouling, there is currently no real statutory provision or power to manage this apart from on an individual basis through potentially using a Community Protection Notice. It is also considered appropriate to consider replacing the DPPO (alcohol control zone) now.

## 3. Community Consultation

The Anti-Social Behaviour, Crime and Policing Act 2014 and the *'Reform of anti-social behaviour powers Statutory guidance for frontline professionals'* sets out the requirements for consultation around a PSPO.

Before making a PSPO, the council must consult with the Chief Officer of Police, and the local police body, which was done in relation to the proposed PSPO; no comments, either in favour of or against the PSPO, were received from the Police.

The council must also consult whatever community representatives they think appropriate. In this case, a consultation took place on the Council website



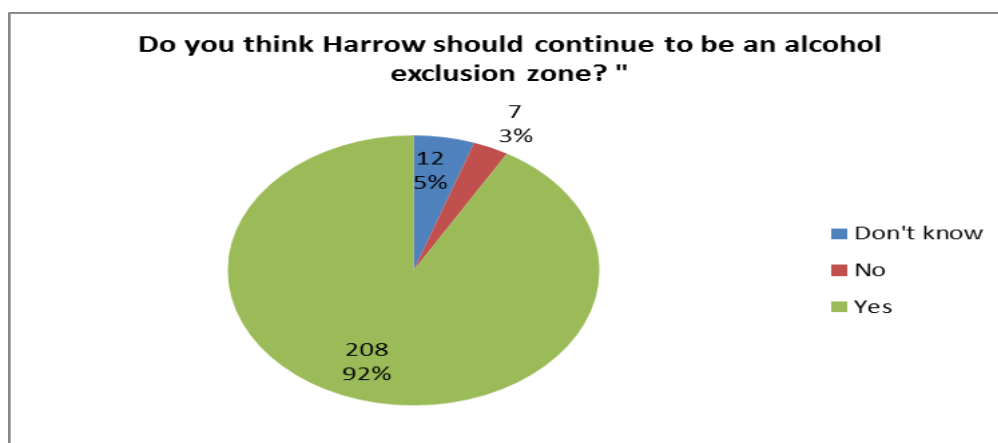
from 16<sup>th</sup> May 2016 to 17<sup>th</sup> July 2016, and further web and paper consultation from 30<sup>th</sup> November 2016 to 16<sup>th</sup> January 2017, to seek maximum coverage and so that anyone could comment on the proposal. Communications took place around this to advertise the consultation, including in the Harrow People and articles in the Harrow Times. The second consultation which took place from 30 November 2016 to 16<sup>th</sup> January 2017 involved targeting areas through the use of public notices, paper copies including in libraries as well as a web based consultation form. Public Notices were put in parks as well as outside schools, covering all aspects of the proposed PSPO but specifically targeting aspects of dog fouling and driving over verges.

Appendix A1 (16 May to 17 July 2016) and Appendix A2 (November 2016 – January 2017) provides the feedback from the consultation, as well as a copy of the Public Notice used. As can be seen, there is wide support for all aspects of the proposed PSPO.

Home Office guidance state that where a local council is considering making a PSPO which will impose restrictions on the use of specific types of land such as registered common land, a registered town or and village green, and open access land, or on public rights of way, it should consider discussing the proposal with relevant interested groups. This proposal does not identify any land requiring specific consideration.

### Alcohol Exclusion Zone

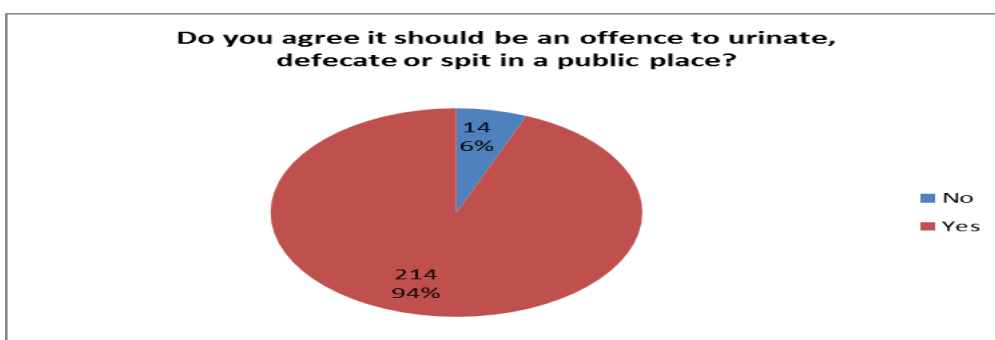
The initial consultation found a 92% support for continuing the alcohol exclusion zone for a further 3 years.



The second consultation had 84% of people supporting this extension

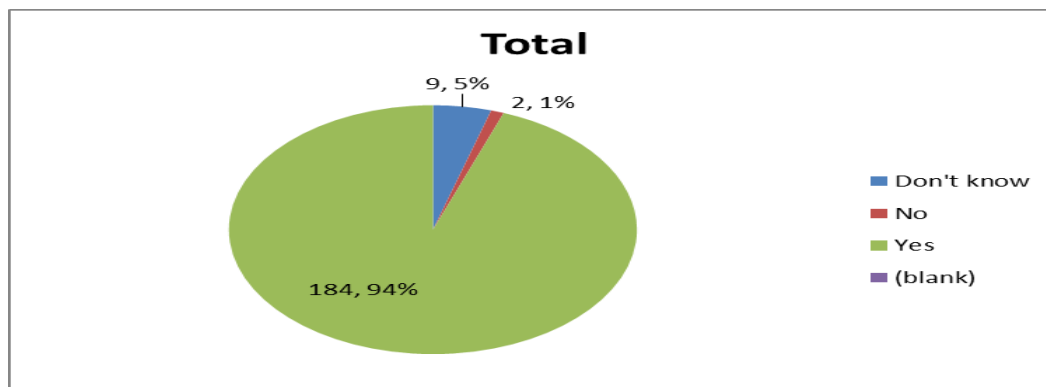
### Urination, defecation and spitting in public

The intial consultation grouped these aspects together and shows strong support across the board.

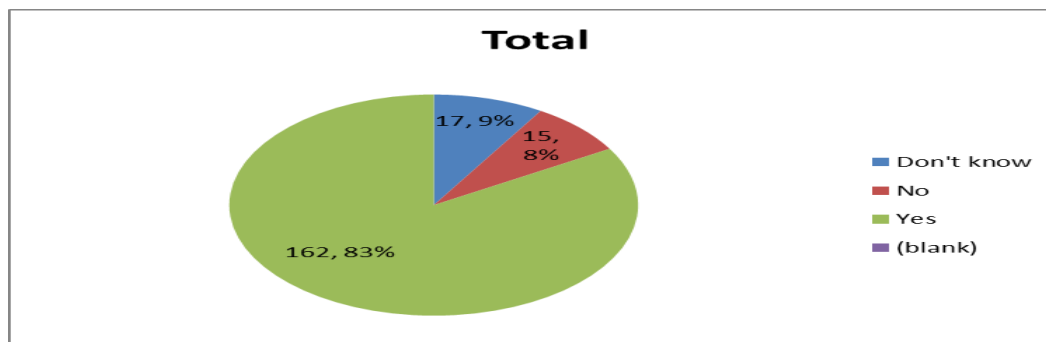


The second consultation split these aspects down into their individual elements, to consider how each were viewed.

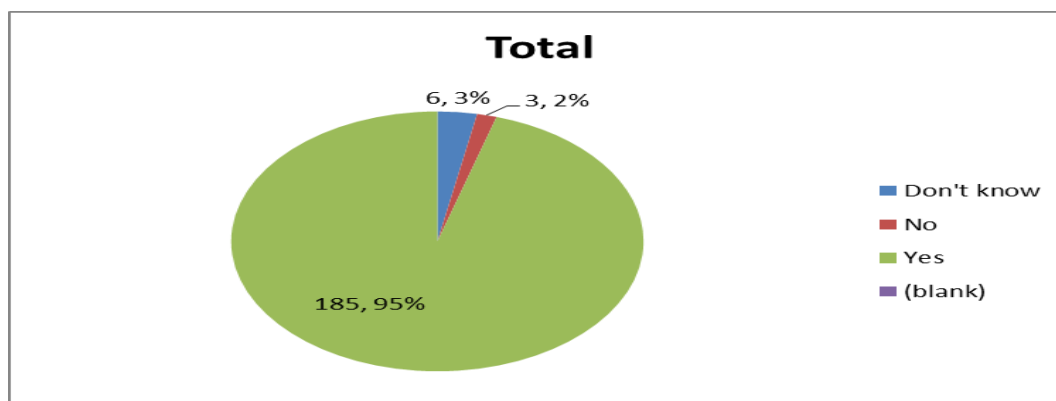
In terms of defecation, 94% of those who responded were in support of introducing such an offence using a Public Spaces Protection Order



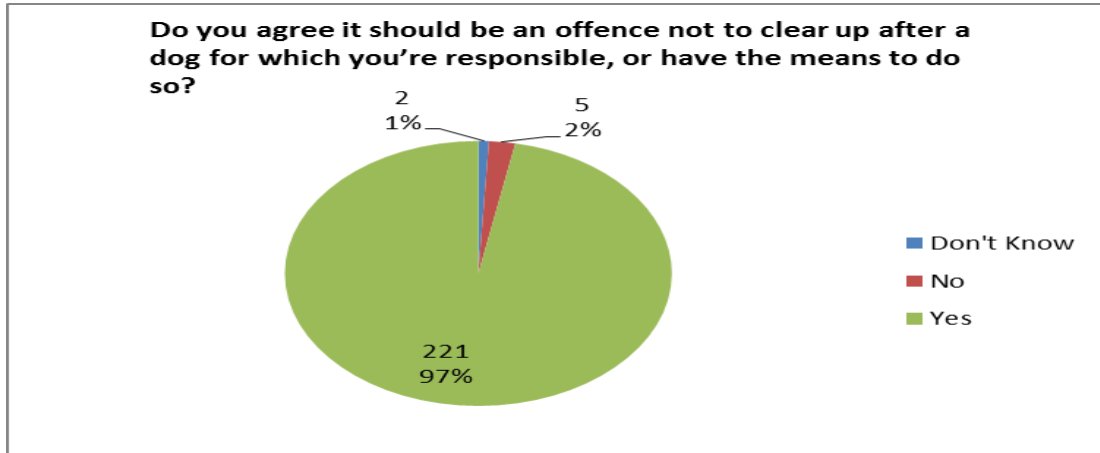
There was also clear support for the offence of urination in public places, with 83% support.



The consultation clearly showed support for a specific offence of spitting, with 95% of those responding in support.

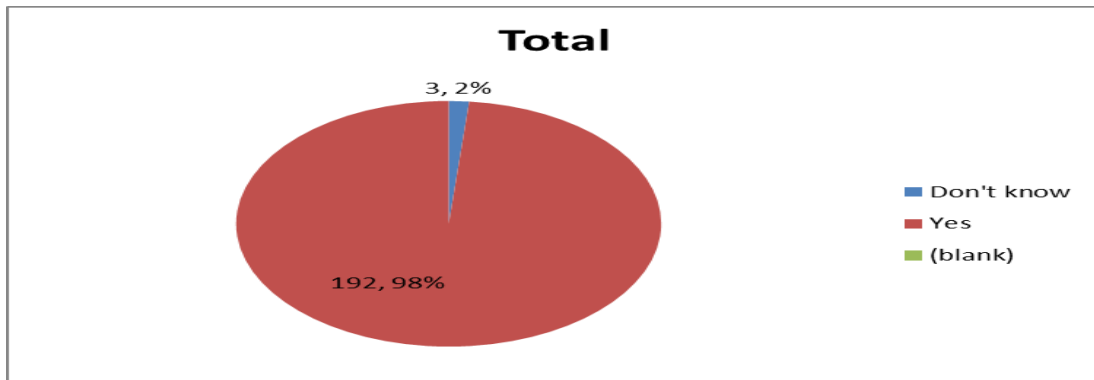


Dog fouling is a very emotive aspect amongst residents, and the original consultation showed strong support for both the aspect of making it an offence to not clear up after your dog, as well as not having the means to do so.

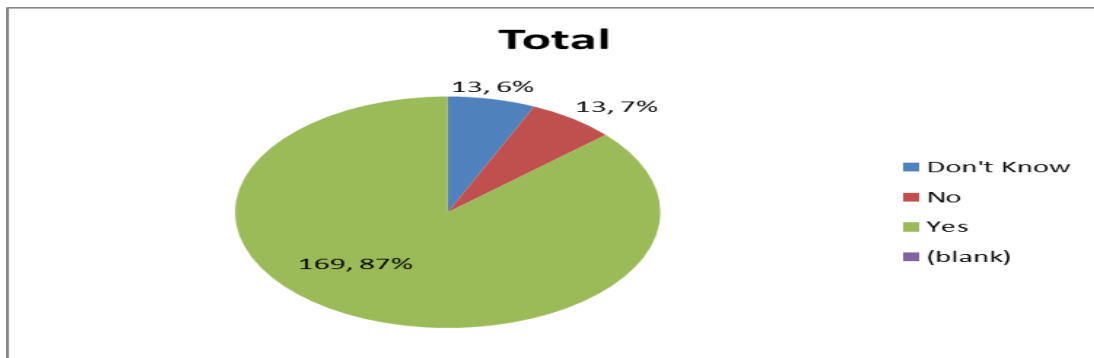


Again, for the second consultation these aspects were split up and consulted on to ensure specific support for both aspects.

There was 98% support for making failure to clear up after your dog an offence

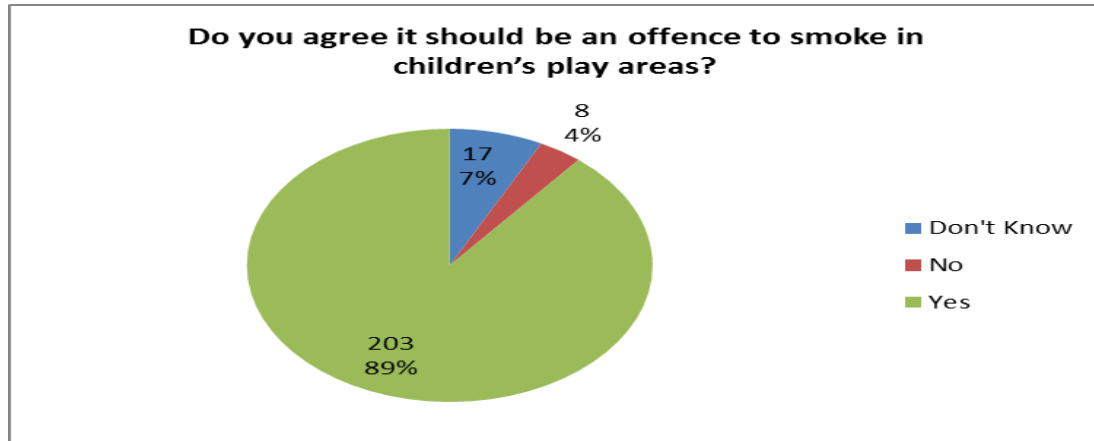


This was further supported with 87% in support of making it a requirement for dog owners to have the means to pick up after their dogs.

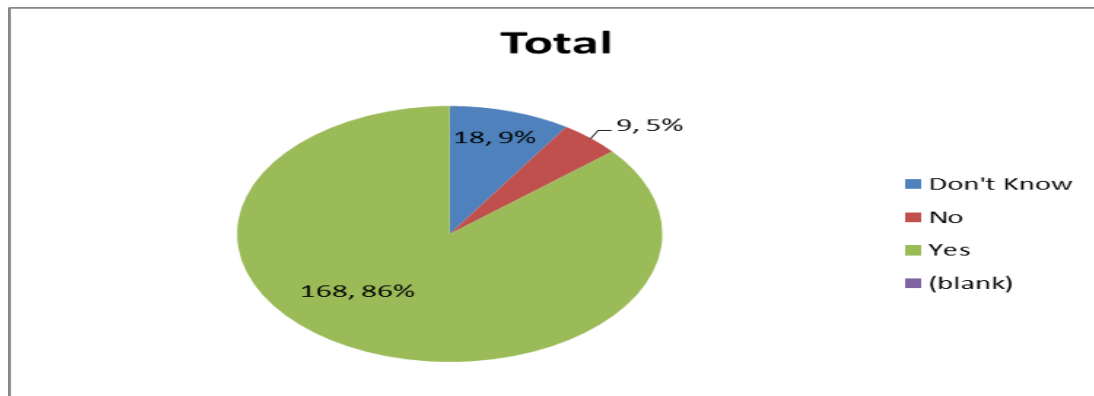


## Smoking in Children's Play Areas

This issue is becoming more prominent, with the encouragement of children to play and do more exercise but in a safe, healthy environment. Support for this was reflected in the original survey, with 89% support.

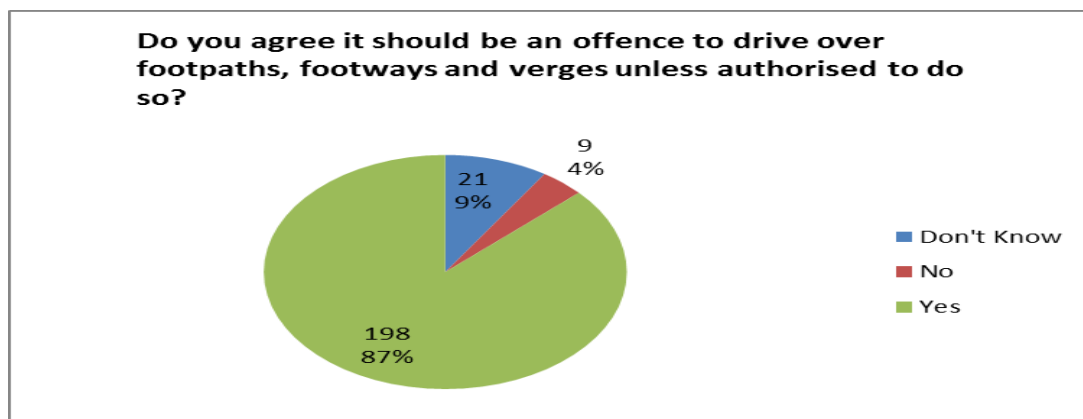


This remained fairly consistent when it went out to consultation again, with 86% support

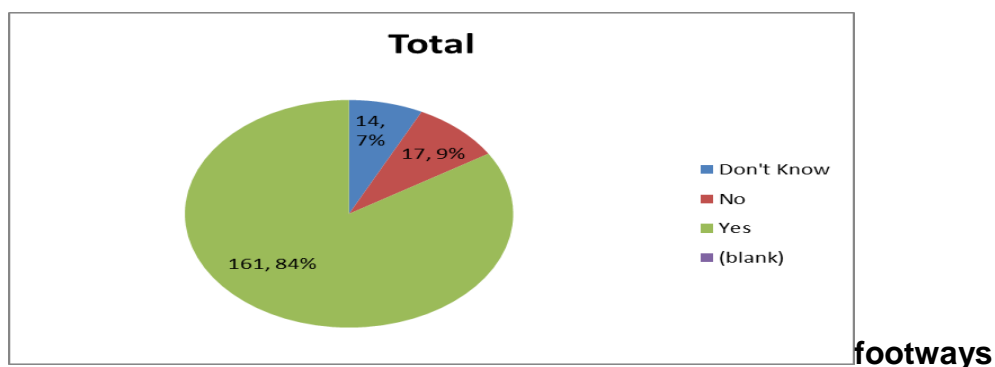
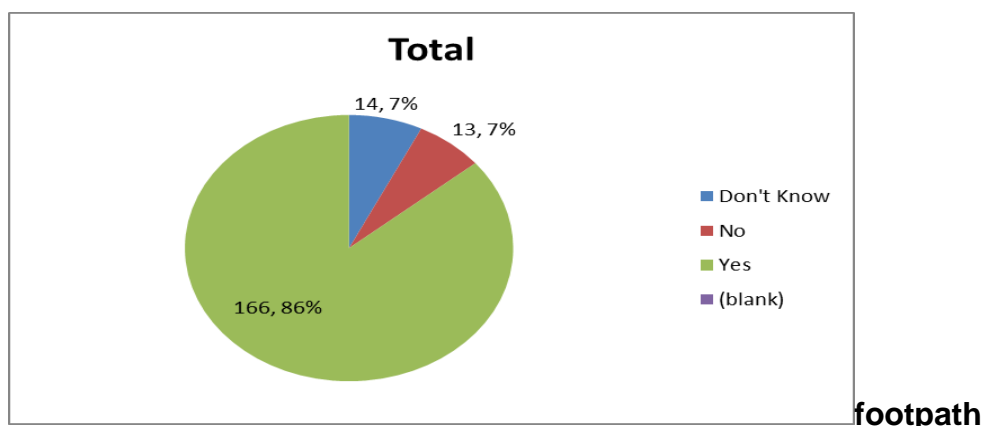


## Driving on cycle lanes, footpaths, footways and grass verges

The original consultation grouped all of these aspects together and found 87% of people responding in support.



When broken down into the individual aspects, this support remained, particularly in respect of footpaths and footways.



Additionally, 87% supported an offence of driving over Council controlled verges without permission from the Highway Authority.

## Implications of the Recommendation

### Resources

The resourcing of a PSPO was an area of concern highlighted in the consultation feedback.

The management and enforcement of the PSPO will be through current staffing levels. Delegation to enforce under the ASB, Crime and Policing Act 2014 rests with all delegated officers within the Community and Public Protection Service. Between all officers, all areas of the Borough are covered including Environmental Compliance Officers (currently responsible for enforcing damage to verges); Park Officers (e.g. dog fouling and smoking in children's areas); and, the Police (Controlled Drinking) but all warranted officers will be able to take action where an offence under the PSPO is witnessed.

Training on the Public Spaces Protection Order can be provided by the Community Protection Team, who lead on these corporately. Additional officers within the enforcement teams can then take on additional monitoring and enforcement.

Due to the fact that the majority of requirements being proposed are nuisance/ environmental matters requiring limited investigation and follow up, it is proposed to use the third party on street enforcement to take on these issues in addition to littering, as they are already involved in the enforcement of littering offences. These are currently areas that the third Party Company manages for other Councils.

It is likely that further legal support is also required to take cases of those that are enforced against that do not pay. As it currently stands, over 7000 FPNs for littering are served every year, with approximately 20% not paid and taken to prosecution. This has resulted in work for two full time legal assistants.

### **Legal comments**

Chapter 2 of Part 4 of the Anti-Social Behaviour, Crime and Policing Act 2014 deals with Public Spaces Protection Orders (PSPO).

Sections 59 – 61 inclusive deal with the power to make such orders, their duration, and their variation and discharge.

In order to make a PSPO, a local authority has to be satisfied on reasonable grounds that two conditions are met:

1. *That—*

- (a) 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*
- (b) it is likely that activities will be carried on in a public place within that area and that they will have such an effect.*

*And*

2. *That the effect, or likely effect, of the activities—*

- (a) is, or is likely to be, of a persistent or continuing nature,*
- (b) is, or is likely to be, such as to make the activities unreasonable, and*
- (c) justifies the restrictions imposed by the notice.*

A PSPO prohibits, or requires, things to be done in an area or for both – i.e. both prohibit and require, but these must be to prevent or reduce detrimental effect in the area. A PSPO can be limited to apply by time/circumstances etc but must be clear to understand what is required and/or prohibited. The legislation sets out the requirements for the content of a PSPO and publication requirements that must be followed.

Under Section 60 of the Act, a PSPO cannot have effect for longer than 3 years unless extended.

Sections 62 and 63 covers aspects relating to PSPOs prohibiting the consumption of alcohol.

Sections 64 and 65 deal with orders restricting public rights of way over the highway.

Section 66 specifically provides an interested party (as defined in the Act) the ability to challenge the validity of a PSPO, or its variation, by application to the High Court. The grounds for such a challenge are that the local authority did not have the power to make or vary the order or include certain prohibitions/requirements, or that a requirement under the relevant part of the Act was not complied with.

There is a 6 week time limit to make such an application from the date of the order or variation. Pending full determination, the High Court can suspend the operation of the order, or variation. Upon determining the application, the Court, if it finds that the authority did not have the power to do what it did/required under the order, or that the interests of the applicant have been substantially prejudiced by a failure to comply with a requirement of the Act in relation to PSPOs, can quash or vary the order or any prohibitions or requirements under it.

Provisions in the Act mean that any existing DPPOs that remain in force three years after the Act came into force automatically become PSPOs. Three years expires in October 2017. As the provisions of the existing DPPO are repeated in the proposed PSPO there is no point in allowing it to remain in force and it should be revoked as recommended in this report.

When considering any proposed PSPOs, the authority must consider any equality issues pursuant to its duty under section 149 of the Equality Act 2010.

## **Financial Implications**

The enforcement shall be carried out within the Public Protection Service as well as the Police and use of the current third party company. The third party company work on the basis of taking a proportion of any successful (e.g. able to be taken to court proceedings) FPN issued, and as long as the payment rate stays around 62% (currently 75%) then there is no cost implication to the Council.

There is an initial cost implication for setting up the scheme through the advertising of the PSPO, as required under the guidance, including use of street signage and media sources. This is estimated to be no more than £10,000 and will be covered within the existing budget.

As it stands, there are two full time legal assistants working on cases resulting from FPNs issued that have not been paid and result in prosecution. The current third party contractor issues approximately 7000 FPNs for littering a

year, of which around 20% are not paid. Due to the amount of cases involved, and with these further offences being added, cases referred for prosecution will exceed the allocated legal hours for the Community Directorate and result in additional legal costs being incurred. While costs are claimed back for each successful prosecution, there is reliance on the Courts in collecting these costs and collection is not guaranteed. The third party company are paid whether or not the Court collects the costs.

Any income will be used to offset costs associated with managing the PSPO requirements and issuing fixed penalty notices which will be met from existing budgets, as well as environmental campaigns to increase education and compliance. To this end the scheme is based on cost recovery but should any income above and beyond this be received it shall be ring-fenced to the environmental compliance team for this purpose and a review of fees carried out as the purpose of the PSPO is not to raise income. Given additional fees likely to be incurred internally by legal spend, any surplus income will also aid in covering this cost.

As with any enforcement, it is imperative that no income target is set as any enforcement should be based on the offence rather than the need to raise money.

## **Performance Issues**

Improving the environment and reducing matters of anti-social behaviour will have a positive impact on helping make a difference to families, businesses and communities.

The introduction of the Public Spaces Protection Order puts in place clear requirements across the Borough that are less bureaucratic and more efficient to enforce. This can be seen in the example of verges; the current burden of proving beyond reasonable doubt that a person has caused damage to a verge which is required to make out the criminal offence requires a vehicle to be seen causing the damage and is difficult to make out. Instead, if the PSPO comes into force members of the public will recognise driving over such areas will lead to their detriment as that will be an offence in and of itself.

If the scheme is not introduced, then it will limit the ability to enforce by the Council in these areas, with resources being focused on individual problems, not addressing the wider issues and limiting the action that is feasible to be taken and prevents the widening the ability for partners (e.g. Police) to deal with anti-social behaviour.

## **Environmental Impact**

The aspects seeking approval are expected to have a hugely positive impact on the Environment, by putting in place a proactive scheme that addresses matters evidenced within the area.



By having clear requirements in place, backed up by the means of a timely penalty for non-compliance (Fixed Penalty Notices), it allows matters that affect the environment to be addressed in a more efficient and effective means and hopefully leading to longer term behavioural changes.

## **Risk Management Implications**

This scheme does not feature in the Directorate or any other corporate risk register.

The consultation and processes undertaken to get to the stage of recommending the PSPO were carried out in line with government guidance and Council decision making and minimises legal risk.

The introduction of a consistent standard also enables a fair and consistent approach, minimising chances of complaints regarding process or policy.

The aspect of resources is covered in 6.1 and there are no health & safety implications associated with this proposal.

## **Equalities implications / Public Sector Equality Duty**

Pursuant to section 149 of the Equality Act 2010 (“the Act”), the council, in the exercise of its functions, has to have ‘due regard’ to (i) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (ii) advancing equality of opportunity between those with a relevant protected characteristic and those without; and (iii) fostering good relations between those who have a relevant protected characteristic and those without.

The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnership, but to a limited extent.

In line with this, an initial Equalities Impact Assessment (EqIA) was completed but did not find that a full EqIA was required as no potential adverse impacts in relation to the decision for this report were considered likely. This was reviewed post consultation and no changes required.

## **Council Priorities**

The Council’s vision:

### **Working Together to Make a Difference for Harrow**

The use of the PSPO aids in meeting the priorities of the Council including:

#### **Making a difference to communities:**

Fundamental to the intention of the legislation which aims to put victims at the heart of the response to anti-social behaviour, and give professionals the flexibility they need to deal with any given situation. This is stated in the Home Office guidance on this area of work.

**Making a difference to the most vulnerable:**

As above, and Home Office guidance recognises that such ASB “is targeted against the most vulnerable in our society and even what is perceived as ‘low level’ anti-social behaviour, when targeted and persistent, can have a devastating effects on a victims life

**Making a difference to families:**

As above.

### **Section 3 - Statutory Officer Clearance**

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 2 June 2017		
Name: Andrew Lucas	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 2 June 2017		

<b>Ward Councillors notified:</b>	<b>No – Borough Wide</b>
<b>EqIA carried out:</b>	<b>YES</b>
<b>EqIA cleared by:</b>	<i>David Corby, DETG Chair – Community Directorate</i>

### **Section 4 - Contact Details and Background Papers**

**Contact:** Richard Le-Brun, Head of Public Protection, 020 8424 6267, Richard.lebrun@harrow.gov.uk

**Background Papers:** Home Office Guidance – Anti social behaviour, Crime and Policing Act 2014, Statutory Guidance for Frontline professionals

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/352562/ASB\\_Guidance\\_v8\\_July2014\\_final\\_2\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/352562/ASB_Guidance_v8_July2014_final_2_.pdf)

**Call-In Waived by the  
Chairman of Overview  
and Scrutiny  
Committee**

**NOT APPLICABLE**

*[Call-in applies]*