

## EQUALITY IMPACT ASSESSMENT (EIA)

Title of EIA		New approach to tackle Anti-Social Behaviour (ASB)
EIA Author	Name	Davina Blackburn
	Position	Strategic Lead - Reg & Communities
	Date of completion	03/02/2026
Director	Name	Julie Newman
	Position	Director of Law and Governance
Cabinet Member	Name	Cllr Khan
	Portfolio	Community Safety

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

## SECTION 1 – Context &amp; Background

## 1.1 Please tick one of the following options:

This EIA is being carried out on:

- ☐ New policy / strategy
- ☐ New service
- ☐ Review of policy / strategy
- ☒ Review of service
- ☐ Commissioning
- ☐ Other project *(please give details)*

## 1.2 In summary, what is the background to this EIA?

It is proposed that there is a change in the way enforcement activity is undertaken by moving to a more ward based compliance officer approach, with officers investigating environmental ASB from first referral through to prosecution.

This three year investment of £735k will fund additional compliance officers, enabling more targeted community engagement while providing resilience for teams to be mobilised to hotspot areas.

Officers consistently assigned to specific wards can build stronger relationships with residents, community groups, and councillors, which helps improve trust and communication. Their regular, localised presence also creates a more visible enforcement profile, acting as a deterrent to anti-social behaviour and increasing community confidence that issues are being addressed.

Additionally, with increased staffing levels, officers will have greater capacity to participate in outreach, education, school visits, and community events that were previously difficult to resource, further enhancing engagement opportunities.

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This will be complemented by exploring new and innovative forms of deterrent and punishment, such as litter picking payback schemes, awareness courses, and other tools similar to name and shame style interventions.

### 1.3 List organisations and people who are involved in this area of work

Coventry residents, visitors and business  
Enforcement team

### 1.4 Who will be responsible for implementing the findings of this EIA?

Davina Blackburn - Strategic Lead - Reg & Communities

## SECTION 2 – Consideration of Impact

*Refer to guidance note for more detailed advice on completing this section.*

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

To find out more about local data, please visit the below links:

[Facts about Coventry](#)

[Census 2021](#)

[Joint Strategic Needs Assessment \(JSNA\)](#)

### 2.1 Baseline data and information to include data on Protected Characteristics, Health Inequalities and Digital Inclusion

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA.

Number of Complaints/Referrals Requiring an Enforcement Response

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2025 Q1	2025 Q2	Required:	2025 Q3
2191	2321		1634

## Number of Proactive Enforcement Actions

2025 Q1	2025 Q2	Required:	2025 Q3
386	410		433

## Number of Reactive Enforcement Actions

2025 Q1	2025 Q2	Required:	2025 Q3
2910	2646		2108

- A **young, diverse, and growing population** with differing needs across protected characteristics.
- Significant **health and socioeconomic inequalities** between wards—particularly in areas that experience higher levels of ASB.
- A clear evidence base showing that **environmental conditions, neighbourhood safety, and visibility of enforcement staff** have disproportionate impacts on vulnerable groups.
- Strong digital inclusion infrastructure, though **digital poverty remains an issue** for some residents, reinforcing the need for **multiple reporting channels** (in-person, telephone, community-based engagement, etc.).

The shift to a **ward-based compliance officer model** aligns with the local evidence base by:

- Allowing tailored responses where inequalities are highest

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- Strengthening community trust and reporting
- Supporting vulnerable populations who benefit from visible presence and more accessible communication routes
- Enhancing early intervention, prevention, and safer neighbourhoods in areas of highest need

### 2.2 Please highlight which Marmot Principles does this EIA Support.

1. **Give every child the best start in life**
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. **Ensure a healthy standard of living for all**
4. **Create fair employment and good work for all**
5. **Create and develop healthy and sustainable places and communities**
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination and their outcomes
8. **Pursue environmental sustainability and health equity**

## SECTION 3 – Protected Groups

### 3.1 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	<b>P</b>	<p>The increased uniformed presence around schools, parks, bus stops and shopping areas is likely to benefit this group by reducing fear of anti-social behaviour and improving feelings of safety.</p> <p>Engagement activities will provide more structured opportunities to involve younger people in awareness, education, and prevention work.</p>
Age 19-64	<b>P</b>	Older people may particularly benefit from cleaner, safer paths and public spaces, improving mobility and confidence.
Age 65+	<b>P</b>	Older people may particularly benefit from cleaner, safer paths and public spaces, improving mobility and confidence.
Disability	<b>P</b>	Disabled residents, including people with mobility impairments, learning disabilities, mental health conditions and neurodiverse individuals, may experience improved accessibility and safety in

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		<p>outdoor environments due to the deterrence of ASB and improved environmental conditions.</p> <p>A more visible officer presence provides easier access to support or reporting for those who may face barriers in navigating traditional contact routes.</p> <p>Officers will need to ensure communication is accessible (e.g., Easy Read, plain language) to avoid disproportionate impacts on individuals with communication or cognitive needs.</p>
Gender reassignment	<b>P</b>	Increased visibility and community presence may support transgender and non-binary residents who may experience higher levels of harassment or feel unsafe in public spaces.
Marriage and Civil Partnership	<b>NI</b>	
Pregnancy and maternity	<b>NI</b>	
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>P</b>	<p>Increased presence can reduce racially motivated harassment and improve safety perceptions</p> <p>Increased engagement can help tackle language and cultural barriers that might otherwise prevent reporting of environmental ASB.</p> <p>Officers will need to use translation services and culturally sensitive approaches to ensure equitable access.</p>
Religion and belief	<b>P</b>	<p>Increased presence near places of worship and during religious events can deter targeted ASB and support crowd safety.</p> <p>Engagement opportunities allow officers to build relationships with faith based organisations and leaders, ensuring environmental ASB issues around places of worship are understood and addressed.</p>
Sex	<b>P</b>	<p>Women and girls disproportionately report harassment in public spaces; visible wardens and rapid response can improve safety and confidence.</p> <p>Opportunities for engagement can help ensure women's safety concerns regarding environmental ASB are understood and prioritised.</p>

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Sexual orientation	<b>P</b>	<p>LGBTQ+ residents may feel more confident using public spaces where uniformed officers are present, particularly in areas where harassment has previously been reported.</p> <p>Increased engagement provides better opportunities to understand and address barriers faced by LGBTQ+ communities in reporting incidents.</p>
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**3.2 On the basis of evidence, complete the table below to show any impact on the following characteristics which are not specified as protected characteristics but should be considered.**

Group	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Care Experienced	<b>P</b>	<p>The increased uniformed presence around schools, parks, bus stops and shopping areas is likely to benefit this group by reducing fear of anti-social behaviour and improving feelings of safety.</p> <p>Engagement activities will provide more structured opportunities to involve younger people in awareness, education, and prevention work.</p>
Armed Forces	<b>NI</b>	
Social Economic Groups (low income, poverty, education, unemployment, community safety and social support)	<b>P</b>	<p>Increased presence is expected to have a positive impact on socio-economic groups</p> <p>A safer and more reassuring public environment can help reduce fear of ASB, support community confidence, and improve access to local services, particularly for those who rely more heavily on public spaces and public transport.</p> <p>Enhanced engagement activities will also create greater opportunities for young people from deprived areas to participate in awareness, education and prevention programmes, helping to build positive relationships with services and supporting early intervention work.</p> <p>This approach can contribute to narrowing inequalities by ensuring that communities most affected by environmental ASB receive improved support, visibility and targeted engagement</p>

## SECTION 4 –Next steps

Planned Action	Owner	Timescale

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### 4.2 How will you monitor and evaluate the effect of this work?

The impact of this proposal will be monitored through feedback received during the consultation process and after implementation., if the proposal is adopted.

### SECTION 5 – Impact on Council Staff

#### 5.1 Will this area of work potentially have an impact on Council staff? Yes/No

If yes

Nature of impact and any mitigation required

Yes - additional staff and restructure of the service

### SECTION 6 – Completion Statement

**As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:**

- No impact has been identified for one or more protected groups ☐
- Positive impact has been identified for one or more protected groups ☒
- Negative impact has been identified for one or more protected groups ☐
- Both positive and negative impact has been identified for one or more protected groups ☐
- The potential impact of this proposal on protected groups is not yet known ☐

Before you submit this form - please save your progress and forward the email you receive with any questions to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk). The team will review your Equality Impact Assessment and provide you with feedback.

Only click submit if the Equality Impact Assessment has been reviewed and you have been advised to by the equality team.

### 7.0 Approval

<b>Name of Head of Service:</b> Davina Blackburn	<b>Date approved by Head of Service:</b> 03/02/2026
<b>Name of Director:</b> Julie Newman	<b>Date sent to Director:</b> 03/02/2026