

Equality Impact Analysis Template

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Dog Fouling and Dog Control Public Spaces Protection Officer
Service area and Directorate responsible
Community Safety, Parks, and Environmental Services, Communities Directorate
Name of completing officer
Vicky Allen, Strategy, Policy and Improvement Officer
Approved by (Corporate Director / Divisional Director/ Head of Service)
Date of approval
Click or tap to enter a date.

Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.

Conclusion – To be completed at the end of the Equality Impact Analysis process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the negative impact on a particular group was disproportionate and the appropriate actions cannot be undertaken to mitigate risk. Or, based on the EIA, the proposal was amended, and alternative steps taken.*

The focus of this is to analyse the impacts of the proposal on residents, service users and the wider community that are likely to be affected by the proposal. If the proposed change also has an impact on staff, the committee covering report should provide an overview of the likely equality impact for staff, residents and service users and the range of mitigating measures proposed.

Conclusion	Current decision rating (see Appendix A)

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the Council’s [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

Following a spate of high-profile incidents involving dangerous dog behaviour, the council intends to introduce a Public Space Protection Order (PSPO) to control the presence and behaviour of dogs and their owners.

Tower Hamlets currently has no formal enforcement tools to deal with irresponsible dog ownership with the exception of dog fouling for which Tower Hamlets Enforcement Officers (THEOs) have power to issue Fixed Penalty Notices (FPNs) for. The recently introduced parks by-laws do not cover irresponsible dog ownership.

The anti-social behaviour, crime and policing act 2014 introduced PSPOs as a tool available to councils to tackle anti-social behaviour. A breach of a PSPO without a reasonable excuse is an offence and a fixed penalty notice can be issued. The council already has PSPOs in place to tackle anti-social behaviour relating to reckless driving, cycling, groups congregating, racing vehicles, drugs and drinking.

The PSPO will be used in conjunction with education and information campaigns to ensure that dog owners are aware of the requirements and have the information they need to change their behaviour.

It is a well-established fact that dogs can play a huge role in improving mental health of their owners, higher rates of exercise and social interaction can be a positive outcome of dog ownership. It is important that a PSPO does not unduly limit dog owners rights to exercise their dog because of a small number of irresponsible dog owners. Conversely, controls introduced by the PSPO may have a positive impact on dog owners who are concerned about dog-on-dog attacks, especially those with smaller dogs. The report identifies the mitigating actions taken to address these concerns.

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

- Council complaints data
- Hospital data for dog bites
- FPN / arrest data from Met Police
- Census 2021
- Feedback from consultation exercise (post consultation)

Complaints – council data indicates there were 20 official complaints made about dangerous dog / owner behaviour between March-June 2023. Of those, 6 were recorded as dog on animal attack and 3 were dog on human attack. Attacks were reported on all land types (parks, estates, streets), and in all postcode areas in the borough.

Hospital data – accident and emergency hospital episode statistics for dog bites (coded W540) shows that between 2013/14 and 2022/23 there were between 1 and 9 episodes per year. The average was 3.5 episodes per year. The number of recorded episodes in Tower Hamlets is lower than the London average of between 3.9 and 6.4 attacks per year over the same period. It is important to note that the number of episodes recorded through A&E records is likely to under report the overall number of attacks and incidents occurring in the borough.

FPN / arrest data – 283 offences in Tower Hamlets recorded by the police over a 5 ½ year period (2018-2023). 43.5% of offences took place on the street and 29% in parks and open spaces. Victims include adults, children, delivery drivers, postmen, car washers and caregivers. Some incidents where dogs attacked assistance animals.

Dog ownership in Tower Hamlets (estimated) - Modelled data from the Animal and Plant Health Agency published in Mar 2023 (relating to 2015) indicates there may be around 24,000 dogs in Tower Hamlets. [Dog population per postcode district - data.gov.uk](https://data.gov.uk).

It is important to ensure that there is sufficient space for dog exercise off the lead.

Postcode District	Dogs Per Household	Number of Households	Number of Dogs
E1	0.04828055	72,549	3,502.71
E1W	0.04695858	11,961	561.67
E2	0.05979562	75,860	4,536.10
E3	0.14805901	44,939	6,653.62
E14	0.08279791	105,004	8,694.11

Census 2021

Age

11.9% of the population is aged 0-9 years old. This age group is most likely to use play parks and other play equipment. Small children may be overwhelmed and/or more susceptible to attack or injury by dogs off the lead.

5.7% of the population are aged 65 and over. Dog owners of this age may find it more difficult to travel to dog-friendly exercise areas due to physical impairment.

Disability

Census data on general health in Tower Hamlets indicates 4.9% of residents have bad health or very bad health. And for limitation of day-to-day activities data indicates that 13% of residents are disabled under the equality act (day to day activities limited a lot or a little). For those residents who use

There are exemptions under the PSPO for people who rely on assistance dogs for assistance with their disability - registered blind or is deaf, has a physical or mental impairment which has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities.

Mental health

Animal ownership can improve owners mental health. The most recent PAW report identified that 51% of owners surveyed gave for deciding to get a dog was that they make

them happy. 37% stated dog ownership was for companionship, 45% said for love and affection, and 31% said for exercise. [pdsa-paw-report-2023.pdf](#)

Sex

In Tower Hamlets 49.8% of residents are female and 50.2% are male.

Gender reassignment

0.6% of residents in Tower Hamlets said their gender identity was different from that registered at their birth.

Marriage and civil partnership

Dog ownership in UK

[National Dog Survey: Describing UK Dog and Ownership Demographics - PMC \(nih.gov\)](#)

This report from March 2023 stated people with the following demographics were most likely to own a dog. 34.9% of dog owning households were made up of two people. 25.5% of dog owning households contained children. Younger people aged 18-34 were more likely to have acquired a dog during the pandemic compared to older age groups. There is no data at local authority level.

Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
Age (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Older people</p> <ul style="list-style-type: none"> • Potential inability to remove dog fouling due to physical impairment. • Physical impairment may reduce the ability to restrain their dog/s on the lead. • May have to travel further to exercise their dog off the lead. • Reduced mobility may negatively impact ability for older residents to access land where dogs can be let off the lead / dog exercise areas due to distance, and terrain. <p>Children</p> <ul style="list-style-type: none"> • It can be assumed that young children who are more likely to be playing on the ground are most likely to benefit from the reduction of dog fouling and a play environment that is safer from accidental trips from uncontrolled dogs or over leads. • Safer for children whose behaviour may agitate a dog causing fear, injury or conflict, either by accident or on purpose. Children can be noisy and unpredictable in their movements and behaviour which could cause some dogs to react in a way which may be, or may be interpreted as aggressive. Prohibiting dogs from children’s play areas may reduce upset, conflict or injury. • Toxoplasmosis can be a more dangerous infection for people with a weakened immunity and can lead to serious complications.

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Disability (Physical, learning difficulties, mental health and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> • Potential <u>inability</u> to remove dog fouling due to physical impairment. • Physical impairment may reduce the ability to restrain their dog/s on the lead. • May <u>have to</u> travel further to exercise their dog off the lead. • <u>Reduced mobility</u> may negatively impact ability for older residents to access land where dogs can be let off the lead / dog exercise areas due to distance, and terrain. • Cognitive impairment may impact some dog owners ability to understand restrictions. • <u>Toxoplasmosis</u> can be a more <u>dangerous</u> infection for people with a weakened immunity leading to serious complications. <p>As people with some disabilities may find it more challenging to comply with the Dog Control PSPOs therefore included in the order are exemptions for people with assistance dogs.</p> <p>Assistance dogs are for those who are trained to support people who rely on their assistance with their disability - registered blind or is deaf, has a physical or mental impairment which has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities.</p>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There is no known direct or indirect disproportionate impact in terms of dog control for residents on the grounds of sex.</p>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There is no known direct or indirect disproportionate impact in terms of dog control for residents on the grounds of gender reassignment.</p>
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There is no known direct or indirect disproportionate impact in terms of dog control for residents on the grounds of civil partnership.</p>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Religion or philosophical belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no known direct or indirect disproportionate impact in terms of dog control for residents on the grounds of religion or philosophical belief.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no known direct or indirect disproportionate impact in terms of dog control for residents on the grounds of race.
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of sexual orientation.
People with Care Experience	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	For children with care experience, see age section above. Statistics ¹ show that 40% of care-leavers experience homelessness within the first six months of leaving local authority care and in general care leavers make up 25% of the

¹ [Young adults leaving the care system – The Care Leavers Association](#)

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
				<p>adult homeless population². Studies show that many people who are homeless rely on dogs for companionship, comfort, warmth, unconditional love and support³. The proposal would only exclude dogs from children’s play areas and sports areas. The proposal may require dogs to be on leads on highways and pavements but would not exclude dogs from being on the highways and pavements. The proposal does not alter any arrangements between a child with care experience who has a dog and their carer.</p>
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>People who are pregnant or on maternity leave may be less agile than other groups of people and therefore may find it more difficult to avoid dogs that aren’t under control of their owner/walker.</p> <p>Toxoplasmosis can be a more dangerous infection for people with a weakened immunity and people who are pregnant and can lead to serious complications.</p>
Other				
Socio-economic	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There is no known direct or indirect disproportionate impact in terms of dog control for residents on the grounds of religion or philosophical belief.</p>

² [Home For Good | Care Leavers and care-experienced young people](#)

³ [Street Paws - Home](#)

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Parents/Carers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Caring for an individual may become easier where there is provision for dogs being on leads.
People with different Gender Identities e.g. Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of gender identity.
Any other groups - Homeless people.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Homeless people. The PSPO covers the following areas: 1) dog fouling 2) dogs on lead by direction 3) dogs on lead in specific areas 4) dog exclusion areas 5) maximum number of dogs. The policy does not exclude any person from owning a dog, and the PSPO orders would not disproportionately affect a homeless person and their dog on the street.</p> <p>The proposal is that dog exclusion areas relate to gated (and possibly ungated) children’s play areas or sports areas. The council has a duty of care to provide accommodation for homeless people with children.</p> <p>There is no proposal to change any existing rules relating to the admittance of dogs into indoor public spaces. This policy is set by other council services (customer services / facilities). Current practice is that guide dogs are the only dogs eligible to be brought inside council buildings.</p> <p>It is assumed that a homeless person will be unlikely to be able to afford to pay a fixed penalty notice. However, a fixed penalty notice is only issued for</p>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
				<p>persistent dog-related ASB and where PSPO conditions are not adhered to when requested by an enforcement officer.</p> <p>There council has mechanisms to support homeless people with dogs if they need to access services. This may include signposting to responsible ownership courses offered by charities, animal warden officers working in collaboration with adult social care to pay for boarding.</p> <p>In addition, the council works closely with two charities that support homeless people with dogs: Dogs on the Street, and Streetdogs who will provide support with food, vet care, leads and muzzles and temporary pet care.</p>

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Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress



Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

- Monitoring number of complaints received relating to dog incidents and conflict – the PSPO may reduce the number of complaints received relating to dog incidents and conflicts.
- Monitoring the number of FPNs issued relating to breaches – communicating PSPO orders may limit the number of FPNs issued.
- Analysing incident type, location, victim and perpetrator equality characteristics (where practicable) etc. to understand where targeted enforcement and/or information, advice and guidance is needed.
- Number of attendees at events where there is information, advice and guidance about dog behaviour – where these events occur.

Appendix A

EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 