

## SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	<b>Environment &amp; Community Services</b>
<b>Service Area</b>	<b>Parks &amp; Highways</b>
<b>Service/policy/function being assessed</b>	<b>High Court Injunction To allow the Council to expedite the removal of unauthorised encampments on Council land</b>
<b>Which borough (s) does the service/policy apply to</b>	<b>Richmond</b>
<b>Staff involved in developing this EINA</b>	<b>Henry Cheung, Roland Copley, David Allister, Yvonne Kelleher</b>
<b>Date approved by Directorate Equality Group (if applicable)</b>	
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	
<b>Date submitted to Directors' Board</b>	

### 1. Summary

#### Please summarise the key findings of the EINA.

- Richmond Council would like to seek a preventative injunction from the High Court to protect several of the Council's Parks and Open spaces, Council managed carparks and highway verges that could be targeted from unauthorised encampment. Please see the updated list of sites which are deemed to be necessary and proportionate based on previous incidents in Appendix 1
- The current legislation [Criminal Justice and Public Order Act 1994](#) enable us to address unauthorised encampments, but the process is time consuming and it doesn't prevent encampments moving into the immediate field or park next to the one they have just been evicted from following a Court Order granted by a Magistrates Court.
- The Council's Parks and Open spaces and any Council owned land and highways could therefore be occupied for several weeks at a time following each new encampment, thus disrupting local community events, causing fear, anxiety and concern for immediate residents and those who wish to visit.
- The Council also spend a significant amount of time and cost to clear any waste or fly-tipping that may have been left behind.
- A successful preventative injunction will allow the Council to expedite the removal of unauthorised encampments on the Council's parks and open spaces, managed Carparks and highways that could be targeted from unauthorised encampment. Welfare checks will no longer be required, and they will be unable to relocate to any other area covered by the preventative injunction (see appendix).
- The benefit of the proposal will allow a more proactive and effective enforcement against unauthorised encampments and any anti-social behaviour associated with encampments.
- The outcome sought is that the residents and visitors of the borough will be able to enjoy our parks and open spaces and any other Council owned land listed in the appendix without disruption or fear of anti-social behaviour through an expedient eviction process. Disruption to local businesses will also be reduced as a result.
- The Gypsy and Traveller Community are most likely to be impacted by this proposal. Gypsies and Travellers are protected from discrimination by the Race Relations Act 1976 (amended 2000), the

Human Rights Act 1998 and the Equalities Act 2010, together with other ethnic groups who are recognised in law as having a cohesive culture, language or set of values. There will be a negative impact on Gypsies and Travellers as they will be unable to set up unauthorised encampments on borough parks and open spaces and any Council owned land listed in the injunction.

- To mitigate the impact there will be clear communications regarding the new approach so that Gypsy and Traveller communities are aware. The new approach will allow Gypsies and Travellers to continue to travel through the borough. The proposal is for a 3 year extension on the existing interim borough wide injunction, however the sites that the injunction would apply to have been revised and are detailed in the below appendix.
- The Council is seeking to balance the needs of Gypsies and Travellers with those of the wider community, considering the adverse effect that unauthorised encampments and fly tipping has on the borough, its residents, businesses and visitors in both financial and non-financial terms.
- The process of seeking an injunction through the courts allows for debate and for an independent view to be taken by the court.
- To mitigate the impact, there will be clear communications regarding the Council's enforcement approach so that travellers are aware. Whilst welfare checks will no longer be necessary, if requested, we will continue to direct any Travellers' welfare issues to the relevant agency or department including medical treatment, surgeries and GPs. Referrals to such entities as housing, through Richmond Housing Partnership, or public health and education through Achieving for Children would be undertaken as appropriate

## 2. Evidence gathering and engagement

**a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand**

Evidence	Source
Local data	DataRich
National Data	ONS
National Data	UK Parliament

**b. Who have you engaged and consulted with as part of your assessment?**

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation
N/A			

## 3. Analysis of need

**Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion**

Protected group	Findings
Age	<p><b>Data:</b></p> <p>Nationally the Gypsy and Irish Traveller population has a young age profile; in the 2021 Census 45.7% were aged 25 or under compared to 30.4% of the England and Wales population (<a href="#">Census, 2021</a>)</p> <p>Percentage of Gypsy or Irish Traveller ethnic groups and England and Wales population at each year of age, split by sex, England and Wales, Census 2021</p> <div><div><p>Females</p><p>● Gypsy or Irish Traveller</p><p>— England and Wales</p></div><div><p>Males</p><p>● Gypsy or Irish Traveller</p><p>— England and Wales</p></div></div> <p>In Richmond under 25's account for 28.43% (55,521) (DataRich 2024, based on 2021 Census)</p> <p>The age of Travellers at unauthorised encampments in the borough was not collected.</p> <p>The injunction would not disproportionately affect any age group.</p>
Disability	<p><b>Data:</b></p> <p>The details of individuals with disabilities at unauthorised encampments in the borough were not recorded.</p> <p>In Richmond 12% of the population are recorded to have a disability which limits their day-to-day activities. (DataRich 2024, based on 2021 Census)</p> <p>A parliamentary report, estimates that 26% of Gypsy and Traveller communities are recorded as disabled (<a href="#">UK Parliament, 2019</a>)</p>

	The injunction would not disproportionately affect those with disabilities.
<b>Sex</b>	<p><b>Data:</b> Nationally equal numbers of men and women identified as Gypsy or Irish Traveller in the 2021 Census. In Richmond, 55% of Gypsies and travellers are female (Data Rich, 2024).</p> <p>In the London Borough of Richmond upon Thames, 48% (93,962) of the population are male and 52% (101,316) are female (Data Rich, 2024).</p> <p>For the unauthorised encampments the gender of Travellers was not collected.</p> <p>The injunction would not disproportionately affect either sex.</p>
<b>Gender Identity</b>	<p><b>Data:</b> In the 2021 Census in Richmond, 0.1% of the borough population (226 people) stated their gender was different from their sex assigned at birth but did not specify what their gender identity was, 0.1% (137 people) were trans women, 0.1% (113 people) were trans men and 0.1% (134 people) identified as one of 'all other gender identities'. Compared to national population, 0.24% (118,000 people) stated their gender was different from their sex assigned at birth but did not specify, 0.1% (48,000 people) identified as trans women, 0.1% (48,000 people) identified as trans men, 0.06% (30,000 people) identified as non-binary and 0.04% (18,000 people) were from another 'all other gender identities'.</p> <p>The injunction would not disproportionately affect any gender identity.</p>
<b>Marriage and civil partnership</b>	<p><b>Data:</b> There were 69,175 households in England and Wales with a household reference person who identified as a Gypsy or Irish Traveller in the 2021 Census. (<a href="#">ONS, 2023</a>)</p> <p>The most common family household type among these households was 'lone parent' at 24.6% (<a href="#">ONS, 2023</a>), compared with 16% of the general national population in England and Wales (<a href="#">ONS, 2023</a>)</p> <p>The second most common household type among households with someone who identified as Gypsy or Irish Traveller was 'married or same-sex civil partnership couple' at 23%. This is compared to 33% of the general national population in England and Wales (<a href="#">ONS, 2014</a>). Data not available from 2021 Census.</p> <p>Data on marital &amp; civil partnership status was not collected for the unauthorised encampments</p>
<b>Pregnancy and maternity</b>	<b>Data:</b>

	<p>In 2021 there were 2,422 conceptions in Richmond borough – an annual conception rate of 65 per 1000 women. This is lower than the conception rate for London (70.8 per 1000) and the rate for England (71.5 per 1000) (Census, 2021).</p> <p>Data on pregnancy and maternity was not collected for the unauthorised encampments</p>																		
<b>Race/ethnicity</b>	<p><b>Data:</b></p> <p>Gypsies and Irish Travellers are protected from discrimination by the Race Relations Act 1976 (amended 2000), the Human Rights Act 1998 and the Equalities Act 2010, together with other ethnic groups who are recognised in law as having a cohesive culture, language or set of values.</p> <p>In the 2021 Census, there were 85 people of Gypsy or Irish Traveller ethnicity in Richmond. This translates to less than 0.1% of the overall borough population.</p> <table><tr><th>Ethnicity</th><th>Total</th><th>% of total population</th></tr><tr><td>Asian/Asian British / Asian Welsh</td><td>17,467</td><td>8.9</td></tr><tr><td>Black/ Black British / Black Welsh / Caribbean or African</td><td>3,687</td><td>1.9</td></tr><tr><td>Mixed /multiple ethnic group</td><td>10,662</td><td>5.5</td></tr><tr><td>White</td><td>157,111</td><td>80.5</td></tr><tr><td>Other ethnic group</td><td>6,350</td><td>3.3</td></tr></table> <p>80.5% of the borough population is recorded as White (Census, 2021). This is significantly higher than the London average.</p> <p>In the past 24 months there have been 6 unauthorised encampments in the Borough involving Travelers. On each occasion a welfare check is offered but this is often rejected so we are unable to provide detailed local population data.</p>	Ethnicity	Total	% of total population	Asian/Asian British / Asian Welsh	17,467	8.9	Black/ Black British / Black Welsh / Caribbean or African	3,687	1.9	Mixed /multiple ethnic group	10,662	5.5	White	157,111	80.5	Other ethnic group	6,350	3.3
Ethnicity	Total	% of total population																	
Asian/Asian British / Asian Welsh	17,467	8.9																	
Black/ Black British / Black Welsh / Caribbean or African	3,687	1.9																	
Mixed /multiple ethnic group	10,662	5.5																	
White	157,111	80.5																	
Other ethnic group	6,350	3.3																	
<b>Religion and belief, including non belief</b>	<p>Data on religion and beliefs, including non-belief was not collected for the unauthorised encampments.</p> <p>In the Richmond Borough (Census, 2021):</p> <ul style="list-style-type: none"><li>• 45.4% are Christian</li><li>• 37.9% No Religion</li><li>• 4.4% Muslim</li><li>• 2.1% Hindu</li><li>• 1.0% Sikh</li><li>• 0.8% Buddhist</li><li>• 0.7% Other religion</li><li>• 0.6% Jewish</li></ul>																		

<b>Sexual orientation</b>	<p>In Richmond, 3.4% of the population identify as Lesbian, Gay Bisexual or 'Other', compared to 3.16% of the population in England and Wales (Census, 2021)</p> <p>Data on sexual orientation was not recorded for the unauthorised encampments.</p>	
<b>Across groups i.e. older LGBT service users or Black, Asian &amp; Minority Ethnic young men.</b>	No specific issues raised	
<b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b> <b>Include the following groups:</b> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	<p><b>Deprivation –</b>  11.7% of Gypsy and Irish Travellers live in the most deprived 10% of neighbourhoods, higher than the average 9.9% (<a href="#">GOV, 2022</a>). There is one traveller site in the borough in Hampton. The location of this site is in one of the LSOA's with a higher Index of Multiple Deprivation (26.698) in the borough (DataRich, 2024).</p> <p><b>Low income groups &amp; employment –</b>  Gypsy and Irish Traveller ethnic group had the lowest proportion of respondents who were economically active at 47%, in England and Wales this was 63% (<a href="#">GOV, 2022</a>). No local data available.</p> <p><b>Carers –</b>  Gypsy or Irish Traveller ethnic group was among the highest providers of unpaid carer in England and Wales at 11 per cent (10 per cent for England and Wales as a whole) and provided the highest proportion of people providing 50 hours or more of unpaid care at 4 per cent (compared to 2 per cent for England and Wales as a whole) (<a href="#">ONS, 2014</a>). In Richmond, 20% of Gypsy or Irish Travellers were noted to be providing care (<a href="#">DataRich, 2019</a>)</p> <p><b>Single Parents –</b>  The most common family household type in Gypsy and Traveller communities was 'lone parent' at 24.6% (<a href="#">ONS, 2023</a>), compared with 16% in England and Wales (<a href="#">ONS, 2023</a>). No local data available.</p> <p><b>Health Inequalities –</b>  In the 2021 Census Those who identified as Gypsy or Irish Travellers were more than twice as likely to report bad or very bad health (12.5%) compared with the England and Wales population (5.2%). In Richmond, from the 2011 Census, 37% of Gypsies and Irish Travellers reported their health as 'not good', compared to 30% of Gypsy and Irish Travellers reporting this way in London (<a href="#">DataRich 2024</a>)</p> <p><b>Refugee status –</b>  There are an estimated total of 1827 persons with refugee status in Richmond</p>	
	<b>Scheme</b>	<b>Richmond</b>

	Syrian Resettlement scheme (2015-date)	Six families (32 people)
	Afghan Resettlement scheme (2021 – date)	35
	Homes for Ukraine scheme (2022 – Date)	1,052
	Unaccompanied Asylum Seeking Children	26
	Hong Kong BNO scheme	No exact data available, but proxy data shows 497 School Applications from Hong Kongers and 985 people indicated they were born in Hong Kong in the 2021 Census

### Data gaps

Data gap(s)	How will this be addressed?
Data on local Gypsy & Traveller population by protected characteristic	Data will be collected if possible during welfare checks, where these are accepted.

## 4. Impact

Protected group	Positive	Negative
<b>Age</b>	<p>Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage children, young people and older people to make greater use of parks and public places and Council owned facilities.</p> <p>The injunction would allow for the Gypsy and Traveller communities to travel through the borough to alternative destinations.</p>	<p>The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document.</p> <p>The injunction would prevent young and old from making unlawful encampments in the borough.</p>
<b>Disability</b>	<p>Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage people with a disability to make greater use of parks and public places and Council owned facilities.</p>	<p>The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document.</p> <p>The impact of the proposal is neutral on the subject of disability.</p>

	The injunction would allow for the Gypsy and Traveller communities to travel through the borough to alternative destinations.	
<b>Sex</b>	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage women to make greater use of parks and public places and Council owned facilities	<p>The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document.</p> <p>The impact of the proposal is neutral on the subject of sex.</p>
<b>Gender Identity</b>	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	<p>The injunction would impact the Gypsy and Traveller communities by preventing them from making any unlawful encampment on the sites listed in this document.</p> <p>The impact of the proposal is neutral on the subject of gender identity.</p>
<b>Marriage and civil partnership</b>	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The impact of the proposal is neutral on the issue of marriage and civil partnerships.
<b>Pregnancy and maternity</b>	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The impact of the proposal is neutral on the issue of pregnancy and maternity
<b>Race/ethnicity</b>	<p>Preventing unauthorised encampments at selected locations will reduce anti-social behaviour and fear for personal safety, encouraging all to make greater use of parks and open spaces and Council owned facilities.</p> <p>The injunction would allow for the Gypsy and Traveller communities to travel through the borough to alternative destinations.</p>	<p>Gypsies and Travellers are protected from discrimination by the Race Relations Act 1976 (amended 2000), the Human Rights Act 1998 and the Equalities Act 2010, together with other ethnic groups who are recognised in law as having a cohesive culture, language or set of values.</p> <p>There will be a negative impact on Travellers as they will be unable to set up unauthorised encampment on any of the parks and open spaces and any</p>



		<p>Council owned land listed in the injunction.</p> <p>To mitigate the impact there will be clear communications from the Council regarding the new approach so that travellers are aware. Subject to budget holder authorisation temporary signs may be installed at each location listed in the appendix. Further communications such as a press release and information on the Council's website will publicise the new restrictions.</p> <p>The new approach will allow Travellers to continue to travel through the boroughs. The proposal is for a 3 year extension to the current interim injunction. With the injunction cover only the locations listed in the appendix.</p> <p>If requested, we will continue to direct any Travellers' welfare issues to the relevant agency or department including medical treatment, surgeries and GPs.</p>
<b>Religion and belief, including non belief</b>	Preventing unauthorised encampments will reduce anti-social behaviour and fear for personal safety which would encourage all to make greater use of parks and public places and Council owned facilities.	The impact of the proposal is neutral on the subject of religion and belief or non-belief.
<b>Sexual orientation</b>	There are no specific impacts on sexual orientation from this proposal.	There are no specific impacts on sexual orientation from this proposal.
<b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b> <b>Include the following groups:</b> <ul style="list-style-type: none"> <li>• Deprivation (measured by the</li> </ul>	The impact of the proposal is neutral on the subject of socio-economic status	Gypsy and Irish Travellers living in deprivation or that have low income may be negatively impacted by the proposal as they will be moved on from the location of the unauthorised encampment. To mitigate against this, we will communicate the changes regarding unauthorised encampments on the Councils webpages.

<b>2019 English Indices of Deprivation)</b> <ul style="list-style-type: none"> <li>• Low-income groups &amp; employment</li> <li>• Carers</li> <li>• Care experienced people</li> <li>• Single parents</li> <li>• Health inequalities</li> <li>• Refugee status</li> </ul>		
--	--	--

### 5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Review impact after three months and amend in light of any further negative impacts identified	Henry Cheung / Roland Copley	4 months after a successful application
Speak to other councils who have put this approach in place to identify how they mitigated any negative actions and apply in	Henry Cheung / Roland Copley	4 months after a successful application

### 6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation

### Appendix 1: A List of sites within the London Borough of Richmond upon Thames that the injunction would apply to.

1. Ham Riverside Pitches
2. Ham Lands
3. Riverside Drive Open Space
4. Ham Street (Riverside Drive)
5. Ham Street Car Park
6. Ham Common
7. Kew Green
8. Pesthouse Common
9. Kneller Gardens
10. Heathfield Recreation Ground
11. Old Deer Park Conservation Area (Richmond Town Side)
12. Pools on the Park car park
13. Old Deer Park main car park (adjacent to A316)