

Consultation Response to Exeter City Council: Public Space Protection Order

1. On the proposal to enable PSPOs to be extended to individuals (as well as groups of 2 or more persons)

1.1 Public Health has no objections

2. On the proposal to enable PSPOs to extend the period of exclusion from an area for up to 24 hours from 6 hours:

2.1 We would like to see evidence that increasing the PSPO from 6hrs to up to 24hrs is more effective in addressing the behaviour. We recognise that there may be some cases where excluding individuals from an area for longer periods may have benefits to public safety or their own safety.

2.2 What alternatives have been considered?

2.3 Some individuals (often the most vulnerable in society) may need to access essential items such as accommodation, food and prescriptions or have caring responsibilities. Excluding them from an area may have adverse consequences for them or their loved ones. It should be borne in mind that confiscating alcohol from an individual with dependency can have significant consequences for that individual (including medical complications and possible death), which should be considered if displacing them, as would Mental Health Act considerations.

2.4 We would recommend that alongside the issuing of a PSPO there are offers of engagement, signposting, diversionary activity made to help address the behaviour. This has proven effective in Torridge.

2.5 The approach needs to be Trauma Informed. If individuals are repeatedly being issued with PSPOs what is the learning and how will the approach be adapted?

2.6 Are there alternatives to issuing fines? If an individual is street homeless their level of financial capital is likely to be very limited and will further restrict their ability to achieve good health. Before penalties are issued, we would recommend offers of support (i.e. temporary accommodation) are offered.

2.7 If the evidence suggests that the anti-social behaviour is being fuelled by excessive alcohol consumption or illicit drugs, then Public Health would be keen to take a whole systems approach to addressing these issues. This could include review of licencing decisions, opportunities to test new ways of working or propose changes to national policies (e.g., price and availability of alcohol).

2.8 Is there capacity in the system for the Police/ASB officers to monitor adherence to orders lasting for up to 24 hours?