

Shropshire Council Equality and Social Inclusion Impact Assessment (ESIIA)

Name of service change: Proposed Public Spaces Protection Order Shrewsbury Town Centre

Contextual Notes 2016

The What and the Why:

The Shropshire Council Equality and Social Inclusion Impact Assessment (ESIIA) approach helps to identify whether or not any new or significant changes to services, including policies, procedures, functions or projects, may have an adverse impact on a particular group of people, and whether the human rights of individuals may be affected.

This assessment encompasses consideration of social inclusion. This is so that we are thinking as carefully and completely as possible about all Shropshire groups and communities, including people in rural areas and people we may describe as vulnerable, for example due to low income or to safeguarding concerns, as well as people in what are described as the nine 'protected characteristics' of groups of people in our population, eg Age. We demonstrate equal treatment to people who are in these groups and to people who are not, through having what is termed 'due regard' to their needs and views when developing and implementing policy and strategy and when commissioning, procuring, arranging or delivering services.

It is a legal requirement for local authorities to assess the equality and human rights impact of changes proposed or made to services. Carrying out ESIIAs helps us as a public authority to ensure that, as far as possible, we are taking actions to meet the general equality duty placed on us by the Equality Act 2010, and to thus demonstrate that the three equality aims are integral to our decision making processes. These are: eliminating discrimination, harassment and victimisation; advancing equality of opportunity; and fostering good relations.

The How:

The guidance and the evidence template are combined into one document for ease of access and usage, including questions that set out to act as useful prompts to service areas at each stage. The assessment comprises two parts: a screening part, and a full report part.

Screening (Part One) enables energies to be focussed on the service changes for which there are potentially important equalities and human rights implications. If screening indicates that the impact is likely to be positive overall, or is likely to have a medium or low negative or positive impact on certain groups of people, a full report is not required. Energies should instead focus on review and monitoring and ongoing evidence collection, enabling incremental improvements and adjustments that will lead to overall positive impacts for all groups in Shropshire.

A **full report (Part Two)** needs to be carried out where screening indicates that there are considered to be or likely to be significant negative impacts for certain groups of people, and/or where there are human rights implications. Where there is some uncertainty as to what decision to reach based on the evidence available, a full report is recommended, as it enables more evidence to be collected that will help the service area to reach an informed opinion.

Shropshire Council Part 1 ESIIA: initial screening and assessment

Please note: prompt questions and guidance within boxes are in italics. You are welcome to type over them when completing this form. Please extend the boxes if you need more space for your commentary.

Name of service change

Proposed Public Spaces Protection Order for Shrewsbury Town Centre

Aims of the service change and description

This proposed Public Space Protection Order (PSPO), and the rationale behind the service change, was reported to Cabinet in December 2016, ahead of public consultation proposed to be held with stakeholders identified at that point and with the wider community. An initial ESIIA was completed at that stage. This set out the evidence that had been collected at that point, together with results of engagement with stakeholders, which had led to the drafting up of a set of proposals to be consulted upon about how such an Order could operate in Shrewsbury Town Centre, should Cabinet approve such a move.

By way of brief reminder here of the context, Cabinet were previously advised about the Anti-Social Behaviour, Crime and Policing Act 2014, which sets out a range of provisions to help target antisocial behaviours (ASB) that have a detrimental impact on the lives of those within a community. One of the provisions within the Act enables local Authorities to introduce Public Spaces Protection Orders (PSPO's) which are intended to provide the means of preventing individuals or groups committing anti-social behaviour in a public space where the behaviour is having, or likely to have, a detrimental effect on the quality of life of those in the locality; be persistent or continuing in nature; and be unreasonable.

Whilst local authorities are responsible for making a PSPO, they must do so in consultation with the police, the Police and Crime Commissioner (PCC) and other relevant bodies who may be affected. A PSPO can be created to cover any public space within the local authority's administrative boundary and this will include any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission.

A PSPO can be in force for any period up to three years maximum after which the Local Authority must consider whether or not to put in place another PSPO. A breach of a PSPO can be dealt with through the issuing of a Fixed Penalty Notice of up to £100, or a level 3 fine (max £1000) on prosecution.

Tackling ASB is a Shropshire Council priority and will often be linked with other core Council services around Social care, vulnerable adults, safeguarding and hate crime, Highways and public health. It was therefore considered that a measure to help reduce ASB would go some way to help achieve the Council's corporate aims. Cabinet accordingly approved public consultation about this proposed PSPO.

The intention behind this order is to provide a mechanism to allow the police and other authorised officers to address behaviours that are causing concern without the order targeting any particular group of the community and in particular those that may be considered vulnerable or in need of help. This has often been a criticism of PSPOs and this is not the intention behind this order. This is about targeting an individual whose behaviour is causing community alarm, distress etc..

The following prohibitions were proposed for inclusion in the PSPO:

- a) No person shall urinate or defecate in a public area not being a facility intended for such use.
- b) No person shall, for any duration of time, leave unattended in a public area any personal effects or belongings or any other material or paraphernalia including anything that may be considered discarded or waste material.
- c) No person shall refuse to stop drinking alcohol or hand over any containers (sealed or unsealed) which are believed to contain alcohol, when required to do so by an authorised officer, provided that officer has reason to believe that that person is causing or is likely to cause nuisance, alarm, harassment or distress to any other person.
- d) No person shall refuse to disperse from a public area and not to return to that public area for 48 hours when required to do so by an authorised officer, provided that officer has reason to believe that that person is causing or likely to cause nuisance, alarm, harassment or distress to any other person.

The proposed PSPO was drafted to take into account these specific behaviours and activities.

Only two behaviours are actually being criminalised outright (see (a) and (b) above) with the other two prohibitions simply providing an ability for authorities to respond effectively to concerns by stopping unacceptable individual behaviour and where necessary to remove the cause. Only where a reasonable request from an authorised officer is refused would that individual commit a criminal offence under the PSPO.

The PSPO therefore does not stop any activity, where that activity is being undertaken in an appropriate manner and therefore does not criminalise specific activities (although some activities may already be a criminal act by virtue of other legislation) other than urinating and defecating and leaving belongings in a public place for which there are strong arguments to prohibit outright.

It should be noted that prohibition c) is a continuation of a prohibition from a previous order/bye law brought about by Shrewsbury and Atcham Borough Council so in effect this is not a new restriction for the town centre and simply updates and renews a historical issue.

In establishing a PSPO, appropriate signage must be displayed in accordance with the requirements of the Act and regulations made under it. This requires the PSPO to be made available on the Councils website and for adequate signage to be placed on entry points to the public area and within the said area.

Intended audiences and target groups for the service change

The intended audiences and target groups are considered to be:

- Residents and visitors of the town centre.
- Local businesses operating within the town centre.
- Shrewsbury Town Council.
- Shropshire Council (Environmental Maintenance, Public Health, Housing Options, Highways, Safeguarding, Social Care).

- Chief inspector of West Mercia Police.
- Police and Crime Commissioner.
- Shrewsbury MP
- Shrewsbury BID
- Shrewsbury Town Centre Residents Association
- The Ark (Outreach Service)
- Team Shrewsbury
- Street Pastors
- Accommodation providers (Shropshire Housing Alliance, Parish rooms)
- Shropshire Fire and Rescue Service.
- Shropshire Tourist Board (Visit Shrewsbury)
- The Marches Local Enterprise Partnership
- Fairness, Respect Equality Shropshire (FRESH)
- Shropshire Community Health Trust
- South Staffs and Shropshire Healthcare NHS Foundation Trust
- The Shrewsbury and Telford Hospital NHS Trust
- Shropshire Clinical Commissioning Group (CCG)
- Voluntary Groups (see below)

This list was not intended to be exhaustive or in order of priority and will be added to and amended as and when appropriate. The following Voluntary Groups and organisations were also included in a general notification and request to consider the consultation.

Aquarius
 Barnabas Church Centre (Foodbank Plus)
 British Red Cross
 Churches Together in Shrewsbury
 Citizens Advice Shropshire
 Energize Shropshire, Telford & Wrekin
 Hope Church Centre (Shrewsbury)
 Impact Addiction Services
 Landau Limited
 Royal Air Forces Association Shrewsbury Branch
 Royal British Legion
 Shrewsbury Christian Centre Association
 Ark
 Shrewsbury Furniture Scheme
 Shrewsbury Homes for All
 Shropshire Housing Alliance
 Shropshire Football Association
 Shropshire RCC
 Shropshire Youth Association
 Sova Staffordshire & Shropshire Young People Project
 SPC
 SSAFA Shropshire
 Stonham
 Street Pastors (Ascension Trust)
 The Roy Fletcher Centre
 The Hive
 Trident Reach
 Victim Support

Youth Support Services Ltd (YSS)

Evidence used for screening of the service change

Full details about the evidence collected to inform the initial proposal was presented to Cabinet at its meeting on 21st December 2016. Cabinet agreed that the public consultation exercise be undertaken to further inform the process and to gather the views of the community as a whole, prior to a further report coming back to Cabinet in May 2017.

Formal analysis of the data collated between October 2016 and April 2017 has now been undertaken to provide additional evidence of the ongoing issues still being experienced in the proposed area for the PSPO. The data collection processes were developed towards the end of September 2016 to help reflect the issues identified within the PSPO and enable the impact of the PSPO, if implemented, to be monitored.

An extract of the data from this report is produced below:

Supporting data: Alcohol related

Data Source: Team Shrewsbury, SCC and Police

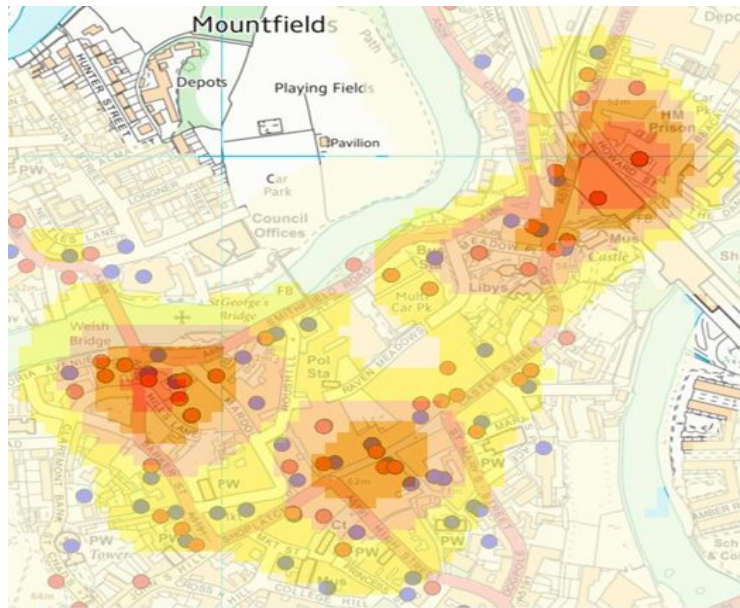
DATASET	OCT	NOV	DEC	JAN	FEB	MAR
Alcohol Related Incidents	13	10	2	6	9	18
Alcohol Litter	4	7	0	2	2	8
Total	17	17	2	8	11	26

Supporting data: General Behaviour

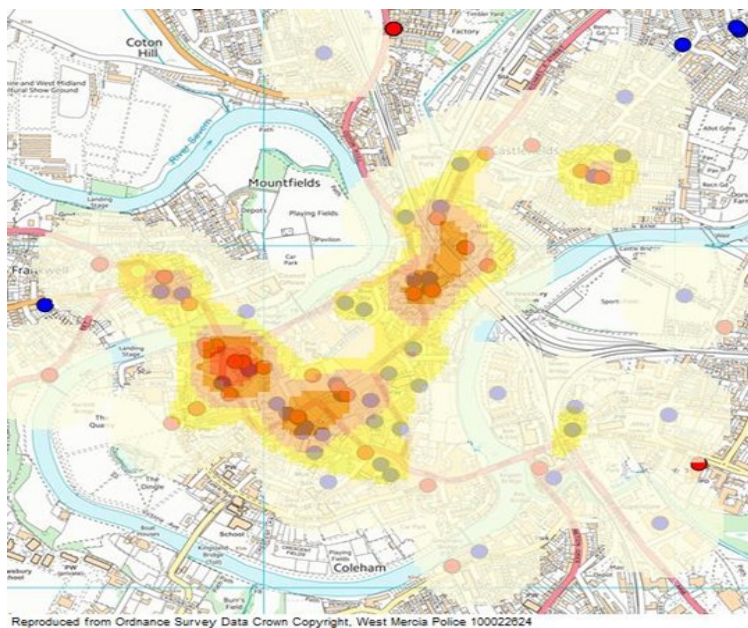
Data Source: Team Shrewsbury, SCC and Police

INCIDENT TYPE	OCT	NOV	DEC	JAN	FEB	MAR	TOTAL
Alcohol litter	4	7	0	2	2	8	23
Alcohol related	13	10	2	6	9	18	58
Aggressive begging	0	1	0	0	1	2	4
Begging	2	4	5	2	3	8	24
Nuisance busking	0	1	0	1	0	0	2
Congregation	8	14	2	11	8	19	62
Damage/Arson	13	11	7	9	8	5	53
Dog control	2	3	0	2	2	5	14
Dog fouling	1	1	1	2	0	3	8
Drug litter	15	17	11	20	19	24	106
Drug misuse	11	7	1	2	3	7	31
Drug dealing	2	2	0	0	1	1	6
Urinating/Defecating	9	7	1	3	5	4	29
Fly tipping/Littering	13	7	2	6	14	3	45
Personal items left	3	4	1	9	2	1	20
Graffiti	1	0	0	1	0	1	3
Suspicious behaviour	4	3	2	3	1	11	24
Grand Total	101	99	35	79	78	120	512

POLICE Alcohol related Crimes (red dots) and incidents (blue dots) with hotspot.
1st October 2016 – 20th February 2017



POLICE Alcohol related Crimes (red dots) and incidents (blue dots) with hotspot.
21st February 2017 – 3rd April 2017



Supporting Data: Belongings and possessions

Data Source

INCIDENT TYPE	OCT	NOV	DEC	JAN	FEB	MAR
Personal Belongings	3	4	1	9	2	1
Alcohol Litter	4	7	0	2	2	8
Drug Litter	15	17	11	20	19	24
Fly Tipping/Littering	13	7	2	6	14	3
Total	35	35	14	37	37	36

Supporting Data: Excrement and urination

Data Source: Team Shrewsbury, SCC and Police

INCIDENT TYPE	OCT	NOV	DEC	JAN	FEB	MAR
Urinating/Defecating	9	7	1	3	5	4

Specific consultation and engagement with intended audiences and target groups for the service change

The public consultation focussed on the actual content and the prohibitions set out in the draft PSPO as well as providing opportunity to provide additional comments in respect to other concerns within the proposed town centre area.

The consultation ran from the 9th January 2017 to 12th March 2017 and consisted of an online survey with a copy of the proposed PSPO and a FAQ document to provide information on what a PSPO is, the process being undertaken and what the implications are, being made available too.

It was published on the Shropshire Council website with notices posted on town council notice boards. In addition the Shropshire Council Community Hub at 1a Castle Gates, Shrewsbury was set up so that individuals visiting in person could make use of the facilities present at the Hub in order to complete the on-line survey. A press release was issued when the consultation began and a media briefing with Councillor Mal Price was held which resulted in good media take up by local radio and press.

Further, all consultees detailed in the section above were made aware of the consultation either through email or via a news update sent by the Councils Feedback and Insight Team.

All consultees were encouraged to complete the on-line survey. A small number of comments were received directly including a full written response from the National Council for Civil Liberties ('LIBERTY'). Feedback will continue to be encouraged through all channels in recognition of digital inclusion challenges.

The consultation focused specifically on the prohibitions set out in the draft PSPO but also gave the opportunity for consultees to provide additional comments.

The consultation whilst enabling the Council to engage with the community and any interested

parties, has also helped to assess if the correct measures have been identified and will help reduce the risk of a legal challenge as to the validity of the PSPO. An appeal against a PSPO can be lodged by anyone who lives in, or regularly works in or visits the area in the High Court within six weeks of issue. Further appeal can be made when a PSPO is varied by the local authority. In addition to the above the process can be the subject of a Judicial Review at any time.

The information and data received from the consultation indicate strong support for each of the four proposed prohibitions.

For the prohibition relating to urinating/defecating in a public place over 65% of respondents stated it was a problem in the area with over 82% of respondents in support of this prohibition remaining in the PSPO.

For the prohibition relating to leaving personal effects in a public area over 71% of respondents stated it was a problem in the area with over 79% of respondents in support of this prohibition remaining in the PSPO. 50% of respondents had felt this behaviour had worsened over the last 12 months with a further 24% thinking it had remained the same and just over 4% believing the behaviour had improved.

For the prohibition relating to alcohol and stopping people drinking in a public place over 67% of respondents stated excessive alcohol consumption in the area was a problem in the area with over 81% of respondents in support of this prohibition remaining in the PSPO.

For the prohibition requiring individuals to disperse from a public area over 78% of respondents stated there were behaviours that would be preventable with over 78% of respondents in support of this prohibition remaining in the PSPO.

In total there were 108 respondents to the online survey, 1 hard copy survey completed and in addition 3 emails and 1 letter were also received during the consultation period. One of the emails suggested a slight amendment to the proposed area; an email from the Police confirming their support for the PSPO, and email from the town council clarifying the area to be covered and an email from a representative of one of the churches providing yet more evidence of their experiences including £30,000 worth of damage to the church. The letter, from Liberty, challenges the validity of the content of the PSPO whilst claiming it is intended to target the homelessness. The letter has been considered and reviewed with comments made in respect to the points raised, and has been produced as an Appendix to the May 2017 Cabinet report.

The consultation has highlighted a number of other behaviours which cause concern to the respondents including busking, chuggers, littering, rough sleepers, drug taking, vomiting, abusive language, better licensing of pubs with zonal areas, begging, inconsiderate cycling, parking on yellow lines and traffic speed. In the main these are issues where legislation already exists to tackle the problem/s or where another initiative has been put into place to tackle, for example, from December 2016 chuggers are controlled through the use of a Site Management Agreement in partnership with the Public Fundraising Association (PFRA).

Whilst mainly in favour of the PSPO there were a small number of concerns expressed that the PSPO would be targeting rough sleepers, which is a perception shared by Liberty.

The PSPO contains no prohibition that directly prohibits rough sleeping itself as an activity and this is certainly not the intention. However, it is reasonable to expect anyone sleeping

rough to act and display appropriate behaviour whilst in the area just like any other person. Where that behaviour fails to meet the standards expected, irrespective of who carries on the behaviour, then those individuals should expect to be challenged by the Authorities using all the tools available to them including the PSPO.

Potential impact on Protected Characteristic groups and on social inclusion

Using the results of evidence gathering and specific consultation and engagement, please consider how the service change as proposed may affect people within the nine Protected Characteristic groups and people at risk of social exclusion.

1. Have the intended audiences and target groups been consulted about:
 - their current needs and aspirations and what is important to them;
 - the potential impact of this service change on them, whether positive or negative, intended or unintended;
 - the potential barriers they may face.
2. If the intended audience and target groups have not been consulted directly, have their representatives or people with specialist knowledge been consulted, or has research been explored?
3. Have other stakeholder groups and secondary groups, for example carers of service users, been explored in terms of potential unintended impacts?
4. Are there systems set up to:
 - monitor the impact, positive or negative, intended or unintended, for different groups;
 - enable open feedback and suggestions from a variety of audiences through a variety of methods.
5. Are there any Human Rights implications? For example, is there a breach of one or more of the human rights of an individual or group?
6. Will the service change as proposed have a positive or negative impact on:
 - fostering good relations?
 - social inclusion?

Initial assessment for each group

Please rate the impact that you perceive the service change is likely to have on a group, through inserting a tick in the relevant column. Please add any extra notes that you think might be helpful for readers.

Protected Characteristic groups and other groups in Shropshire	High negative impact <i>Part Two ESIIA required</i>	High positive impact <i>Part One ESIIA required</i>	Medium positive or negative impact <i>Part One ESIIA required</i>	Low positive or negative impact <i>Part One ESIIA required</i>
Age (please include children, young people, people of working age, older people. Some people may belong to more than one group eg child for whom there are safeguarding concerns eg older person with disability)				YES
Disability (please include: mental health conditions and syndromes including autism; physical disabilities or impairments; learning disabilities; Multiple Sclerosis; cancer; HIV)				YES

Gender re-assignment (please include associated aspects: safety, caring responsibility, potential for bullying and harassment)				YES
Marriage and Civil Partnership (please include associated aspects: caring responsibility, potential for bullying and harassment)				YES
Pregnancy & Maternity (please include associated aspects: safety, caring responsibility, potential for bullying and harassment)				YES
Race (please include: ethnicity, nationality, culture, language, gypsy, traveller)				YES
Religion and belief (please include: Buddhism, Christianity, Hinduism, Islam, Judaism, Non conformists; Rastafarianism; Sikhism, Shinto, Taoism, Zoroastrianism, and any others)				YES
Sex (please include associated aspects: safety, caring responsibility, potential for bullying and harassment)				YES
Sexual Orientation (please include associated aspects: safety; caring responsibility; potential for bullying and harassment)				YES
Other: Social Inclusion (please include families and friends with caring responsibilities; people with health inequalities; households in poverty; refugees and asylum seekers; rural communities; people for whom there are safeguarding concerns; people you consider to be vulnerable)				YES

Guidance on what a negative impact might look like

High Negative	Significant potential impact, risk of exposure, history of complaints, no mitigating measures in place or no evidence available: urgent need for consultation with customers, general public, workforce
Medium Negative	Some potential impact, some mitigating measures in place but no evidence available how effective they are: would be beneficial to consult with customers, general public, workforce
Low Negative	Almost bordering on non-relevance to the ESIA process (heavily legislation led, very little discretion can be exercised, limited public facing aspect, national policy affecting degree of local impact possible)

Decision, review and monitoring

Decision	Yes	No
Part One ESIIA Only?	YES	
Proceed to Part Two Full Report?		NO

If Part One, please now use the boxes below and sign off at the foot of the page. If Part Two, please move on to the full report stage.

Actions to mitigate negative impact or enhance positive impact of the service change

This proposal is considered likely to have an overall 'Low positive impact' for the community and for Protected Characteristic groupings. The proposal stems from provisions within the Anti-Social Behaviour, Crime and Policing Act 2014 legislation and is intended to benefit the community as a whole by reducing ASB and providing a mechanism to resolve issues quickly and efficiently, and therefore also be of benefit to Protected Groupings within the community.

The PSPO along with other initiatives will form part of the toolkit available to the police and the Local Authority to tackle the challenges within the restricted area, which it is anticipated will help to improve the public places for the majority of the community. This does not necessarily mean the use of Fixed Penalty Notices (FPNs) or legal action. This is also reflected in the Council's Better Regulation and Enforcement Policy which enables the Council to also consider other sanctions including warning and simple cautions.

The PSPO is intended to tackle behaviours which are considered unacceptable within the community. This is demonstrated through the strong support received via public consultation.

The public consultation has provided clear evidence to support the implementation of the PSPO with the current prohibitions receiving significant support from respondents. Whilst other behaviours have also been identified it is not considered appropriate or necessary to include these within the PSPO at this time, especially where primary legislation already exists to challenge those issues.

In response to the consultation, it is proposed that the PSPO be amended to remove the reference to public disorder which was included in two of the prohibitions. Further, that the area covered by the PSPO also be amended to include the small area of land in front of the Guildhall which adjoins the Frankwell Car Park and playing fields area; an area which has been the subject of ASB.

An action to mitigate any perceived negative impact of the measures on vulnerable people, including rough sleepers, will be to proactively communicate to all groupings within the community and to stakeholders and respondees such as Liberty that the PSPO is not a mechanism that sets out to punish poverty related issues - it sets out to punish unacceptable behaviours caused by individuals acting inappropriately irrespective of status / wealth and applies equally to matters also commonly associated with the night time economy.

The aims of communication will be to address the small number of concerns expressed that the PSPO would be targeting vulnerable groupings including rough sleepers; to continue to

work with advocates for the vulnerable, such as Liberty; and to continue to visibly welcome feedback on this matter in line with the Council's values around openness and transparency. This is further evidenced by the publication of the full list of Liberty's concerns and responses to them, as part of Cabinet papers about this proposed service change.

The service area will seek to work with the Council's corporate communications team and portfolio holder to develop and implement a media strategy accordingly, including actions already in place to help individuals as well as society.

For example, there are measures in place to help vulnerable people who are homeless and rough sleeping and this includes support from a variety of agencies including the Council, Shrewsbury Ark, Shropshire Recovery Partnership, Police and the medical profession. A recent initiative is the Homeless Outreach Street Triage (HOST) service which consists of a new outreach vehicle containing a combination of a plain clothes Police Officer, a mental health social worker from The Redwoods Centre, an Ark Outreach worker, Shropshire Recovery Partnership worker and a housing officer from Shropshire Council. The team seek out and visit Rough Sleepers on the street with the aim to fast-track the help and support available to them, working as a team to get Rough Sleepers accommodated quicker than ever before. Further, the Council supports the Alternative Giving Scheme which operates within the Town centre. This allows people to provide donations which are specifically used to assist homeless people.

Actions to review and monitor the impact of the service change

Having assessed the evidence collected over the last 12 months, improvements to the recording process are resulting in more focus around individual behaviours, as opposed to generic data. This should enable a clear and improved monitoring process which can be utilised by Team Shrewsbury to help identify the effectiveness of the PSPO, where additional support may be needed and to react to any emerging threats. This improved data will enable the PSPO to respond to changes happening in the area through the inclusion of new prohibitions or removal of others as well as amending the area covered by the PSPO.

A PSPO can be put in place for a maximum period of three years and then must be reviewed if it is proposed to renew the order.

During this period, evidence of the issues affecting the town centre will continue to be gathered. Through the use of the ASB reporting form Team Shrewsbury will be able to monitor the effects of the PSPO on an ongoing basis and if necessary throughout the life of the Order it can be amended to remove specific elements where the evidence demonstrates that the prohibitions/requirements have been sufficiently effective or indeed to include new prohibitions/requirements to tackle emerging problems.

The Trading Standards and Licensing Service will undertake to work with the police where enforcement is required and will monitor any offences reported by the police. Shropshire Council is the only Authority able to prosecute a case in the Court where a breach of a PSPO is identified. Any such case will be assessed in line with the Council Better Regulation and Enforcement Policy which can be found on the Shropshire Council website at


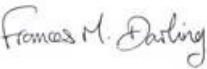


<https://www.shropshire.gov.uk/media/892162/Better-regulation-and-enforcementPolicy-Aug-13.pdf>

This will ensure that any enforcement action undertaken in respect to the PSPO is consistent and in line with that of any other enforcement process undertaken by the Council.

Feedback from the local members covering the geographical area for the PSPO along with the Portfolio holder, local MP and the Police and Crime Commissioner will be key to aiding understanding of the impact on the local community as these are key engagement channels for the community alongside direct feedback to the service area.

It is anticipated that they will therefore be able to help to feedback on the effectiveness and continued need or otherwise of the PSPO, along with ongoing liaison with the Town Council and local businesses and residents.

Scrutiny at Part One screening stage

People involved	Signatures	Date
Grant Tunnadine	 Investigation, Compliance and Intervention Team Manager	11 th May 2017
Frances Darling	 Trading Standards & Licensing Operations Manager	11 th May 2017
Lois Dale	 Rurality and Equalities Specialist	11 th May 2017
Rod Thomson	 Director of Public Health for Shropshire	11 th May 2017

**This refers to other officers within the service area*

***This refers either to support external to the service but within the Council, eg from the Rurality and Equalities Specialist, or support external to the Council, eg from a peer authority*

Sign off at Part One screening stage

Name	Signatures	Date
Grant Tunnadine	 Investigation, Compliance and Intervention Team Manager	11 th May 2017
Rod Thomson	 Director of Public Health for Shropshire	11 th May 2017