






# Abortion Clinic PSPO Consultation Results

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## Introduction and Methodology

Over the course of the consultation, we received over 2000 responses from; local residents, service users, staff, businesses and stakeholders who held a view on our proposals.

To analyse the results, the consultation was broken down into the relevant response methods:

-  **Online survey** – this has been aligned to the Anti Social Behaviour, Policing and Crime Act 2014. This was to assess whether or not the results demonstrate that the statutory thresholds required by the act have been met. This has only been done for this response method because the questions asked align well with the relevant sections in the act (see table in Appendix A). Both statistical quantitative and thematic qualitative methods have been used
-  **PSPO email inbox** – Both statistical quantitative and thematic qualitative methods have been used
-  **Hard copy letters** – Qualitative analysis only (low volumes)

There were two main consultation avenues utilised by the above mentioned parties. The first method was the online survey, this included user surveys that were keyed into the online survey by a researcher employed as part of the Consultation Team. The second was the PSPO email inbox ([Engagement@lambeth.gov.uk](mailto:Engagement@lambeth.gov.uk)) which was contacted directly by respondents. It is important to acknowledge that within the PSPO email inbox we received slight variations of a petition style stock response that was sent over 1,300 times. The third much less used method was by letter posted into the authority. In total there were 699 online survey responses, 1,506<sup>1</sup> emails and 4 letters.

The results of the consultation will be used to determine whether or not the initial perceived problem the council had identified was further substantiated by people in the locality. The online survey and email inbox allowed free text responses to be provided regarding the proposals. Evidence obtained will be aligned to the relevant sections within the Anti Social Behaviour, Crime and Policing Act 2014. This is in particular reference to whether the activity is; persistent and ongoing, reasonable or unreasonable and whether there is a demonstrable detrimental impact to people in the locality.

The consultation analysis includes many verbatim free text responses received from respondents. Where relevant, the responses are colour coded according to the level of support for the proposals expressed by that respondent. Those colour coded blue are respondents who expressed overall support for the proposals and those colour coded yellow are those who were against the proposals overall.

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<sup>1</sup> This is a distinct count based on the name of the responder and the sender's email address –some responders had emailed more than once

## The Online Survey

- 91% of Lambeth residents who responded to our online survey indicated overall support for the proposals ('strongly support' = 82% and 'support' = 9%)
- 77% of total respondents indicated being a Lambeth resident (541 of 699) with 365 respondents indicating that they live close to a clinic. Of those who lived close to a clinic there was a 92% overall support rate for the proposals, this was the highest support rate of all the breakdowns regarding residency
- 7% of Lambeth residents (38 respondents) were against the proposals ('strongly do not support' = 6% and 'do not support' = 1%).
- The overall support<sup>2</sup> rate for the proposals was 86.1% for all respondents

**Table 1: Showing Raw Numbers for Responses to the Question: "Given your experience, to what extent do you support our draft PSPO?"**

Level of Support for Proposal	Blank	Not a Lambeth Resident	Lambeth resident but doesn't live near clinics	Lambeth resident who lives near a clinic	Grand Total
Strongly support	39	59	141	303	542
Support	9	4	15	32	60
Neither support nor do not support	0	0	2	0	2
Do not support	6	3	1	6	16
Strongly do not support	15	9	11	20	55
Don't know/no opinion	2	1	0	2	5
Blank Response	7	4	6	2	19
<b>Grand Total</b>	<b>78</b>	<b>80</b>	<b>176</b>	<b>365</b>	<b>699</b>

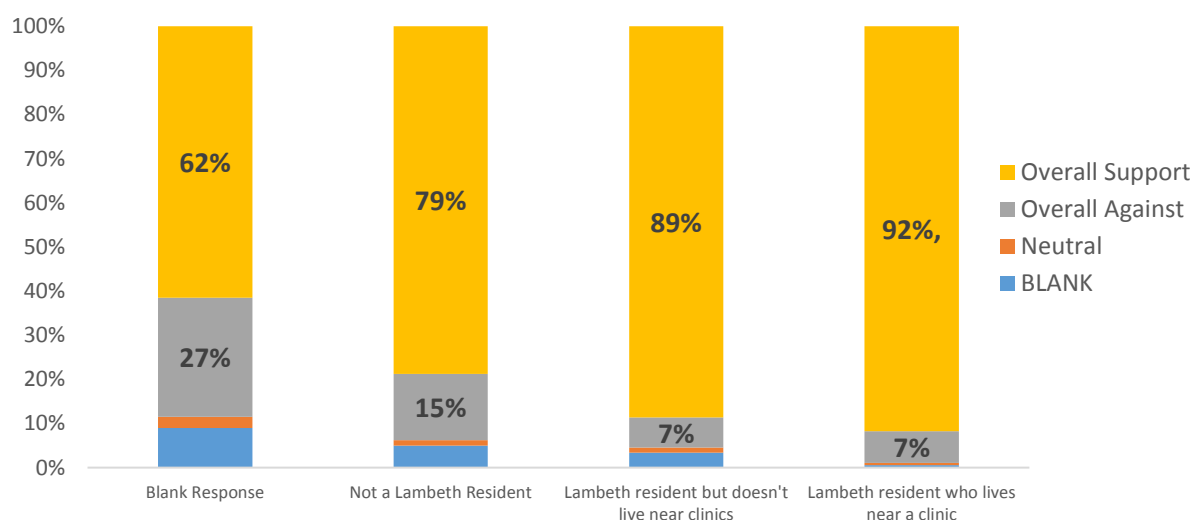


Figure 1: Column chart showing support levels of proposals by residency type

<sup>2</sup> Overall support is defined as any respondent who answered 'strongly support' OR 'support'. Therefore overall against is defined as any respondent who answered 'strongly do not support' OR 'do not support'.

When breaking down the results further it provides us with a better understanding of where the support levels differ across different groups.

- ✚ 78 respondents identified themselves as past or present service users with 19 identified as having used BPAS Streatham, 53 identified as having used Marie Stopes in Brixton and a further 6 respondents identified as having used both clinics. Of the service users, 69 (88.5%) expressed overall support for the proposals. Of the remaining 9 service users, 6 left the question blank, 1 indicated neither support or do not support and 2 were overall against the proposals
- ✚ 7 clinic staff responded online and all 7 expressed overall support for the proposals
- ✚ Thirteen respondents identified themselves as local Lambeth business owners, four of which are located near to Marie Stopes, three located near BPAS in Streatham and a further six located in Lambeth but not near either clinic. All thirteen expressed overall support for the proposals
- ✚ 58 respondents (8%) were pregnant at the time of completing the survey, of these; 78% strongly supported proposals and a further 9% supported proposals
- ✚ One of the multiple choice questions asked respondents to tick what best described them and provided two options: pro-choice and anti-choice. Several people responding to the consultation objected to our use of these terms and suggested that it was intended to frame the debate and thus evidence of prejudice. Whilst we acknowledge these points, we would argue that these are commonly used terms to describe those who support access to abortion services and those that do not and believe that our use of these terms in the context of this consultation was clear and appropriate. This distinction did however impact the results of this part of the consultation as many people opposing the proposals selected pro-choice as the option that best described them

### *Do the Results Indicate Whether the Issue is Persistent and Ongoing?*

Respondents were asked **“How many times have you experienced this activity in the last 12 months?”**

Just over half (52%) of people who replied answered that they had witnessed the activity in the last 12 months and 96 respondents (14%) had witnessed the activity more than 10 times in the last 12 months. One in three respondents (33%) stated that they had not seen any activity at all in the last 12 months.

**Table 2: Showing Responses to the Question: “How many times have you experienced this activity in the last 12 months?”**

Frequency	Distinct Count	Proportion of Total (%)
1 to 5 times	270	38.6%
11 to 25 times	22	3.1%
6 to 10 times	54	7.7%
More than 25 times	20	2.9%
None	230	32.9%
No Answer	103	14.7%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Respondents were also asked **“How many people were involved at any one time?”**

The largest proportion of respondents answered that there were 1 to 5 people at any one time (35%). However, 139 respondents which accounts for one in five responses answered that there were more than 10 people involved at any one time.

**Table 3: Showing Responses to the Question: “How many people were involved at any one time?”**

No. of People	Distinct Count	Proportion of Total (%)
1 to 5 people	246	35.2%
11 to 20 people	35	5.0%
6 to 10 people	99	14.2%
More than 20 people	5	0.7%
No Answer	314	44.9%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Below are a series of free text<sup>3</sup> responses to the question **“Please describe your experience (if any) of the activity we propose to limit in the last 12 months (e.g. handing of leaflets, praying, speeches to passers-by, taking photographs, harassment, etc.)?”** that are relevant to persistent and ongoing nature of the problems:

*“I can't be sure about timescale, but I have lived in Raleigh Gardens for just over three years. In this time I have been aware of people standing outside the entrance to the clinic, trying to talk to people entering and give them leaflets, praying and providing a visible/physical barrier to entry.”*

*“I have been living off Leigham Court Road for 4.5 years and drive past the clinic on Leigham Court Road on a fairly regular basis. I would estimate that 8 times out of 10 (during opening hours) there are protesters outside usually with leaflets. It's usually two or three people which I believe would be intimidating for any woman accessing the clinic especially if she is alone. As I am driving I am not sure what they may say to anyone who may be accessing the clinic. However once time in the last 3-4 months I drove past and there was two women and one man outside. All looked 55 years +. The man who was considerably older was on his knees on the pavement and appeared to be praying. I found this very visually impactful and very unpleasant. I can imagine someone accessing the clinic would find passing that extremely distressing.”*

*“I am concerned about the anti-abortion groups of people at the entrance of the Marie Stopes Clinic on Brixton Hill who kneel/pray, hand out leaflets. They attempt to deter people from entering the clinic grounds and I have heard them use words which are condemnatory. I have lived in Helix Road for over 20 years and have seen this activity increase in the last few years. I feel it is intimidating, harassing and judgmental to those using legal healthcare services. I think these actions by the pro-life groups are total unjustified and I would be very please to support the public space protection order which Lambeth are proposing.”*

*“I have noticed intermittent activity outside the clinic over the 17 years we have lived in the area, which has included al of the above, plus large images/photographs being stuck onto the wall running adjacent to Brixton Hill. These images have visibly caused considerable distress, and are completely inappropriate for passers-by/children to see.”*

*“Over some years, I have seen leaflets being handed out, praying, harassment, sometimes by a few people and sometimes by many. I have had to step into the road as the group blocked the pavement. One woman was on the drive leading up to the clinic and was being detained by an activist trying presumably to change her mind. While I was on a bus going up Brixton Hill, it stopped at Blenheim Gardens bus stop. Some women were standing behind 3 display boards with large lurid photos of fetuses. A mother and small child alighted and the child veered off to the boards and was pulled away by the horrified mother.”*

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<sup>3</sup> A separate document tabulating all free text responses to the online survey will be made available as an appendices to this report

### *Do the Results Indicate that the Behaviour is Unreasonable?*

All respondents were asked a multiple choice question about whether they thought the behaviour in question was; very reasonable, reasonable, neither reasonable or unreasonable, unreasonable, very unreasonable or don't know. In this section responses have been grouped to provide the options 'overall reasonable', 'overall unreasonable', 'neither reasonable nor unreasonable', 'don't know' or 'blank'.

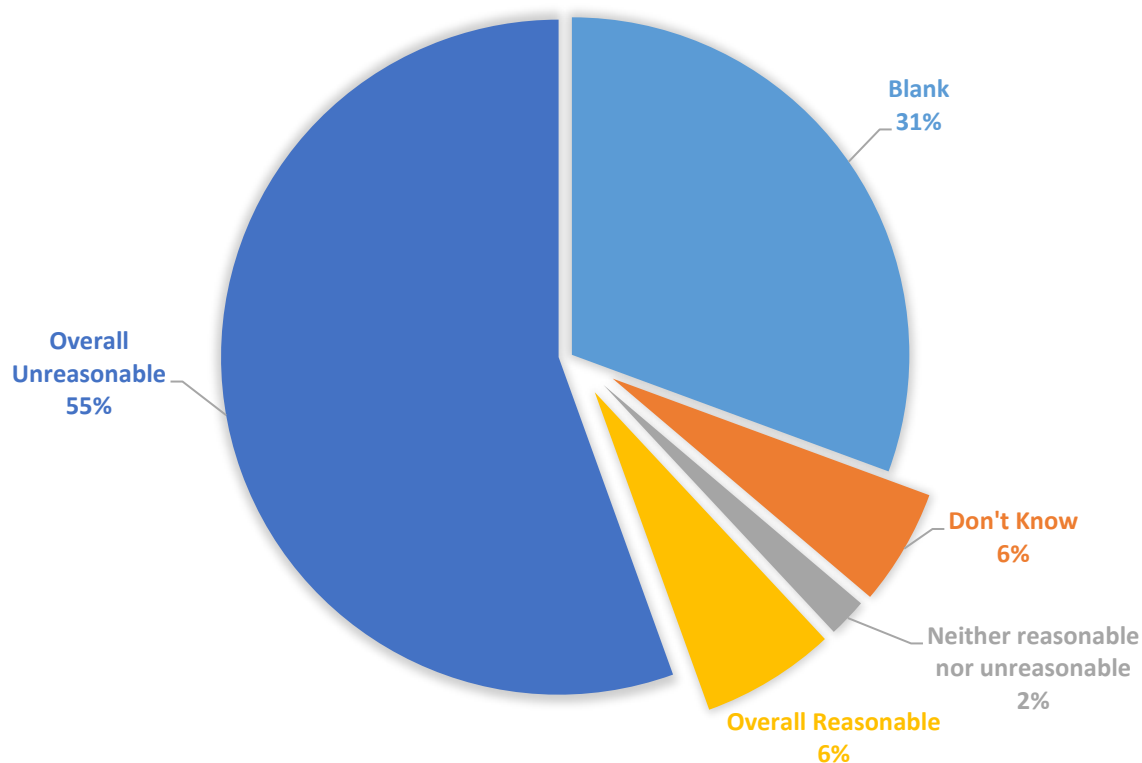


Figure 2: Pie chart showing multiple choice responses as to how reasonable they felt the activity in question was

As Figure 2 shows, over half of respondents felt that the activity and behaviour is unreasonable, the survey also asked two follow-up questions dependent upon how the responder answered. These were:

1. "If very reasonable or reasonable please tell us why"
2. "If very unreasonable or unreasonable please tell us why"

For the first of these questions **"If very reasonable or reasonable please tell us why"** below are some examples of free text responses.

*"Often vulnerable women who are homeless, in debt, in abusive relationships, are being forced into abortion. They need to see that there are alternatives to having abortion and that are those there who will support them if they decide to have a child."*

*"Polite volunteers, mainly women +30, engaging sensitively and bravely with members of the public, who are sometimes rude and obnoxious."*

*"Prayer is one way of showing compassion. When people are made away of someone being in difficulty, they feel compassion. Abortion clinic is a place where people in difficult situation turn to seeking a resolution of their problem. However, abortion clinic is also a business and so understandably will not offer or advertise alternative solutions, and has an incentive to play down the destructive and distressing effect their services have on their clients. Therefore there is a need for an activity whereby a compassion is shown to these clients, and alternative course of action presented."*

*"It is reasonable to give someone an opportunity to get help and support in a matter of life or death, when no one else is offering that help or support – as has been testified by hundreds of women in a crisis pregnancy who had no one else offering them help or support to keep their babies"*

*"Freedom of speech is good. Lambeth residents have the right to express their views if done in a respectful manner, such as handing out leaflets, encouraging the options of counselling (pre or post-abortion), praying for them if their religion encourages that. To take away the freedom to express their views publically in this manner is inhumane."*

For the second of these questions **"If very unreasonable or unreasonable please tell us why"** below are some examples of free text responses.

*"The activity is unreasonable because the intended effect is personal, not political. If those individuals were protesting the law, they would be demonstrating at parliament or at another symbol of power and source of potential change. Instead, they are deliberately confronting patients in order to affect behaviour on an individual level. It's a personal attack designed to hurt the feelings of patients in order to influence their behaviour, which is unreasonable. They aim to confront patients when they are vulnerable. Abortion is a very complicated, emotionally painful choice for anyone and these individuals deliberately and systematically*

*"As above. It is the right of any woman to seek advice and take action about their own body without suffering intimidation. No woman should be subjected to unreasonable pressure from members of any group that uses religious or other moral pressures to deny them that right."*

*"Firstly the women attending the clinic are already in a vulnerable state and are being intimidated and accused of being murderers by people who have no business in telling them what they should and shouldn't do. It is intimidating also for the staff who work there. It is infuriating and disturbing for passersby to have to witness this bullying behaviour. I fear that if something is not done to stop this...that a protester may cause someone physical harm."*

*"Freedom of expression needs to be directed towards those in power. While the anti-abortion campaigners may claim that a solitary, possibly young, likely distressed woman wields power over an unborn foetus, the woman is clearly herself in a position of vulnerability to the intimidation of the campaigners. They wield power over her, and it ceases to be a matter of freedom of expression."*

*"It is unreasonable to try to intimidate, manipulate or harass someone at the point of them going into a clinic for treatment. It is an invasion of privacy. If they want to protest against abortion, fine, but protest against the law rather than targeting individual women who are making a choice about their own bodies."*

A thematic analysis has been conducted regarding both of the questions relating to the reasonable or unreasonable nature of the activity and behaviour consulted on. This amounted to categorising all free text responses from respondents into regularly described themes. These themes are described below:

The regular points by respondents who felt the behaviour and activity was reasonable overall were:

- ✚ Protest is quiet/ peaceful/ legal activity
- ✚ Freedom of speech and expression/ people have the right to demonstrate
- ✚ Reasonable concerns about termination
- ✚ Activities offer women an alternative option

The themes from responses of people who felt the behaviour and activity was unreasonable overall were:

- ✚ Abortion is a legal procedure/ abuse of people's right to seek medical treatment without fear/ breaches freedom of choice
- ✚ Harassment and intimidation of women entering the clinic is damaging, inappropriate, judgemental and unacceptable
- ✚ Threatening behaviour towards clinic staff and service users is unacceptable
- ✚ Protestors should object to laws and policies using other means, not by targeting vulnerable individuals
- ✚ Graphic imagery is distressing to women using the clinic as well as the local community, including children
- ✚ Deters people from entering the clinic and takes up pavement space
- ✚ Unreasonable to impose beliefs on others
- ✚ Activities cause more harm than good
- ✚ Activities are offensive and impact negatively on the local community
- ✚ Intimidation and harassment of vigil participants is unreasonable

## *Do the Results Provide Clarity on Whether the Behaviour is having a Detrimental Impact on People in the Locality?*

There are two free text questions in the online survey which allow us to assess this criteria which fundamentally forms the power to implement the order. These questions were:

1. Please describe your experience (if any) of the activity we propose to limit in the last 12 months (e.g. handing of leaflets, praying, speeches to passers-by, taking photographs, harassment, etc.)?
2. Please tell us how you were affected by the activity?

For the first of these questions **"1. Please describe your experience (if any) of the activity we propose to limit in the last 12 months (e.g. handing of leaflets, praying, speeches to passers-by, taking photographs, harassment, etc.)?"** below are some examples of free text responses. Yellow boxes represent the views of those respondents who were against the proposals, blue boxes represent the views of those respondents who support the proposals.

*"I witnessed four people praying outside the Streatham BPAS on a recent Sunday. One was kneeling directly next to the clinic entrance with leaflets and prayer beads. They were the same leaflets this group usually hands out, starting with 'Mum' and providing graphic images and false medical information. No-one was entering the clinic at the time. I have also seen the protesters outside the Brixton Hill clinic in groups of perhaps 5 or so, directly outside the clinic entrance."*

*"Groups of people praying, clicking rosary beads, handing out leaflets (addressed to "Mum", I took one once), attempting to talk to women using the clinics, and intercepting people passing by."*

*"I live around the corner from the Brixton Hill clinic and have witnessed so-called "pro-life" campaigners harassing women in the street - regardless of whether they are entering the clinic or not. Most of the time this has simply been the handing out of leaflets, proselytising and praying - but I have witnessed it escalate to them physically preventing women from passing by. At times the individuals undertaking these actions have been intimidation and I have heard people being "threatened" with punishment "by God". At nearly all times, the behaviors I have witnessed have begun as inquisitive/promotion of religion but nearly always ended up being abusive."*

*"On regular occasions, I have passed by the clinic in the street and witnessed all of the above. The worst instance was full length posters (allegedly) of dead fetuses which were in full view of passers by and everyone on the buses stopping on Brixton Hill. They were stomach churning for me as a mature adult, horrendous for users of the clinic and disturbing to children on the bus."*

*"It is totally and utterly unacceptable for these groups to stand outside and intimidate and harass women who are trying to access services. At the time I had to use the service I was very vulnerable and young, just the presence of these groups outside the clinic impacted my mental health. Subsequently, after this experience and reflecting on the guilt that was pushed onto me by the groups I ended up self-harming and had to go on anti-depressants at the age of 17 for four years. These groups need to respect the human rights and agency of women, and need to seriously consider/be made aware of the abuse and impact that they are inflicting on these women's mental health, and extend compassion where it's legitimately due."*

*"About once a year i join the prayer group. It is exaggerated by the evidence as the gathering is held opposite on a busy road. One or two people hand out leaflets to passers by and people entering the clinic. There is quiet prayer and singing of songs which can't be heard as opposite. The posters organised by this Catholic group are just pictures of Mother Mary and perhaps a baby but we don't agree with graphic posters and will not use them. If someone does that it is on their own back or maybe they have mental health issues, but equivalent to blaming Muslims for everything Isis does. This prayer group is about 3 times a year. Just because you are handed a leaflet doesn't mean you are being bombarded. When i walk past Brixton station i am given leaflets some of which i have no interest in and some which i would be offended by but i wouldn't call being given a leaflet as harassment."*

*"I have attended a number of pro-life prayer vigils in the last 12 months. I have never seen anyone taking photographs, making speeches or harassing clients. However, I have witnessed those engaged in peaceful prayer being abused and intimidated by members of the public who clearly have no respect for basic freedoms, including freedom of religion, freedom of speech and freedom of assembly."*

*"I have participated in a prayer vigil outside Brixton Marie Stopes once a month in the last 12 months. My role is to offer a leaflet containing information about alternatives to abortion to anyone who wishes to take it. I also answer any questions that members of the public or clients of Marie Stopes have about the information in the leaflets, or the vigil itself. All other members of the vigil pray quietly and do not interact with members of the public. As we are providing an additional choice to women and their partners, and do not prevent their attending their appointments if they wish it, I cannot describe our activity as "anti-choice campaigning"."*

*Pro-life volunteers outside abortion facilities are there to offer help to anyone who wants practical help to keep their babies They are not there to harass or intimidate or judge. They are certainly not there to photograph people going into or coming out of abortion facilities. I have been part of vigils and can assure you I understand that many women have been given misinformation about abortion. BPAS and Marie Stopes are business people being paid huge money by the taxpayer to reduce the population, they have no interest in the vulnerability of people in a crisis pregnancy, they are only interested in financial profit, and are drumming up groups like "back off" who genuinely think they are giving people "choice" - but the only "choice" they offer is abortion. I have knelt in silent prayer while "sister support" and other pro-abortion groups have screamed and jeered using loudspeakers within 1 metre of me.*

*"What I have experienced is peaceful vigils outside certain buildings with people at hand to talk to when women are in need of a listening year. Unlike in places like Mary Stoppes where no help is provided if you are uncertain and need someone to just talk to you without pressure"*

A thematic analysis has been conducted regarding the question **“1. Please describe your experience (if any) of the activity we propose to limit in the last 12 months (e.g. handing of leaflets, praying, speeches to passers-by, taking photographs, harassment, etc.)?”**. This amounted to categorising all free text responses from respondents into regularly described themes. These themes are described below:

The behaviours regularly described by respondents who supported the proposals overall were:

- ✚ Directly approaching and engaging with women entering the clinics
- ✚ Displaying graphic imagery in public (in the forms of placards and banners) outside the clinics
- ✚ Groups of people congregating/demonstrating outside the clinics
- ✚ Obstructing the pavements and entrances/exits of the clinics
- ✚ Kneeling, praying, chanting and making speeches outside of the clinics
- ✚ Prayer vigils in close proximity to the clinics
- ✚ Wearing of body cameras, videoing and photographing women outside of the clinics
- ✚ Handing out leaflets which include graphic imagery/false medical information

The behaviours regularly described by respondents who do not support the proposals overall were:

- ✚ Educating and helping vulnerable women
- ✚ Never seen anything that could be described as harassment
- ✚ Non-aggressive leafleting
- ✚ Peaceful and prayerful vigils
- ✚ Pro-life prayer vigils offering a last minute alternative to abortion

For the second of these questions **“Please tell us how you were affected by the activity?”** below are some examples of free text responses. Yellow boxes represent the views of those respondents who were against the proposals, blue boxes represent the views of those respondents who support the proposals.

*“I feel strongly that after 50 years of abortion in this country, people have been blinded to the affects of abortion on families and the wider society, but most especially on women who regretted having an abortion, and the children for whom abortion is a final death knell. Many people who were the product of very difficult circumstances in conception are grateful their mothers chose life for them even if they had to give them up for adoption. Abortion is a poor thing to offer a woman in a crisis pregnancy in this day and age when we could offer them so much more support, acceptance and good will. Women deserve better than abortion as a choice!”*

*“Generally it is a great experience when The SS [Sister Support] are not there and even more powerful and uplifting when a women decides to keep her baby. When The SS are there it is very depressing and disturbing even for the abortion centre staff and their customers.”*

*“I was quietly pleased to be part of a group offering vulnerable women a practical alternative if they would like to choose it. Abortion is a business, and it is a moot point whether the true well-being of the women is a consideration. No one shouted, and no one was condemned. As a supporter of the vigil, I and the others I prayed with, only felt compassion for those considering an abortion: the point of being there was to offer practical help and that alone. Condemnation and judgement had no part in it. In a country with a proud tradition of democracy, there should be room for more than one view on abortion, and help should be offered to the very poor so that having a child is not merely the preserve of the rich and the middle classes.”*

*"It has not affected me at all except that i respect the rights of people to protest in the quiet and dignified way that they have been over the years. I would be far more deeply affected and worried for everyone in Lambeth if the right to peaceful protest is banned as proposed. This is the sort of thing that police states and dictatorships do. Would Lambeth have banned the suffragettes from protesting too or Nelson Mandela or anyone else with a difference of opinion? In my 30 years in the Borough including working for the Council and the health service this has never been raised as an issue. it is appalling to take away human rights just because of a media frenzy elsewhere. It is galling that Councillors are spending resources on this rather than doing their statutory jobs such as keeping the streets clean which they singularly fail to do. I have never met or heard of a woman or man in the Borough affected by this despite knowing many people who live near both these clinics."*

*"Regret not having these groups stop me from making the worst decision of my life. Why are you suppressing the pro-life agenda. Are people not intelligent enough to make their own decisions about their lives. There is no harassment I assure you, just a voice that is nowhere to be heard. Not in the clinic assessment or in media."*

*"I was extremely upset for several reasons. Having had an abortion myself when I was a young girl and it had been quite a traumatic experience. I was upset for the vulnerable girls and women who are distraught when they go in. They should not have to be subjected to this. I was upset that it did not feel safe for me to walk along the pavement with a young child as there was the possibility of her being confronted with these very graphic and upsetting photographs."*

*"It was pretty upsetting at an already difficult time where we were about to have a termination. The decision had not been taken lightly and as we approached the clinic the last thing we wanted was to be harassed about it. It is not like we were going to change our minds at that point."*

*"The experience left me shaking uncontrollably and made a difficult experience very much worse. Subsequently I was traumatised by what I had experienced, particularly the level of anger, hatred and vitriol that was directed at me. Eventually I felt angry about it."*

*"Felt very bad about myself, traumatised by the messages and images especially as it was already a very difficult and frightening decision for me and I had no family support at the time. I self harmed by cutting my wrists and arms a few days later and was put on anti-depressants for four years"*

*"I felt angry and upset. As someone who has used the services of Mary Stopes on Brixton Hill, I know I would have felt even more upset at the time if I had had to pass the kind of people who now demonstrate outside the clinics. I would have felt intimidated and shamed, by people who know nothing of the circumstances leading to having to visit the clinic!"*

A thematic analysis has been conducted regarding the question **“Please tell us how you were affected by the activity?”**. This amounted to categorising all free text responses from respondents into regularly described themes. These themes are described below:

The themes regularly described by respondents who supported the proposals overall were:

- ✚ Angry that people are trying to enforce their beliefs on others
- ✚ Concerned/sad/shocked/annoyed/upset at insensitive, intolerant and unfair judgement of vulnerable people
- ✚ Dislike of the promotion of unprofessional non-medical advice
- ✚ Distress at the graphic imagery used/which is accessible and difficult to explain to young children
- ✚ Feeling of helplessness and unsure how or whether to respond/react
- ✚ Feelings of guilt/emotional blackmail/anxiety/stress and either reminded of a traumatic past or made the current situation worse
- ✚ Offended, upset, intimidated or insulted by the inappropriate behaviour
- ✚ Uncomfortable and unpleasant having to walk close by, pavement is often obstructed
- ✚ Women's rights to medical privacy and access to services and choice are not respected, it is an invasion of privacy

The themes regularly described by respondents who do not support the proposals overall were:

- ✚ Reinforced a belief that there is a right to freedom of expression and free speech
- ✚ Caused me to self-reflect on my own beliefs and morals
- ✚ Disagreement with the process of abortion
- ✚ Enjoyed offering support to women, a practical solution to abortion and saving lives
- ✚ Found the activity prayerful and peaceful
- ✚ Happy to see a practical solution to abortion being offered
- ✚ Threatened by the state
- ✚ Upset/surprised about the allegations about the demonstrations
- ✚ Wish this group was there when I made the worst decision of my life

There was also a neutral response which expressed feeling conflicted between the freedom of expression and assembly versus women's rights to choose and access healthcare.

## How Useful Will the Proposals Be?

The remaining questions assessed the practicality of the order and how useful or not respondents felt the proposals would be. The survey asked the following questions:

1. Tell us how useful you think our proposed PSPO will be in dealing with this issue?
2. If you don't think it will be useful, tell us what other powers or tools do you think would be more appropriate?

Analysis of the question **"Tell us how useful you think our proposed PSPO will be in dealing with this issue?"** showed that generally respondents felt that the proposals would be useful. There were 600 free text responses on the usefulness of the proposals. Of these, 502 responses expressed overall support for the proposals with 60 responses indicating that they were against the proposals.

Below is a selection of responses indicating that the proposals would be useful:

*"Extremely useful. As a resident and as someone who may need to use these services in the future, I've heard about these kinds of activities outside of the Brixton Hill center, and would feel extremely worried about visiting there knowing there were no safeguards in place. It's also sad to hear that staff at the centre have been made to feel intimidated and abused by groups on the premises, when they are simply providing a legal service. I'm in full support of the PSPO and really pleased to hear Lambeth is considering it."*

*"I am supportive of this plan. I think it represents a thoughtful balancing of the--in this case--competing values of protecting free speech and the right of women and girls to have abuse-free access to reproductive healthcare, including abortion. Thank you for addressing this issue."*

*"I believe that the proposed PSPO is an appropriate and proportionate response as it will prevent these activities from taking place around the clinics and will provide the level of protection required to the staff members and members of the public who have been adversely affected by this behaviour."*

*"I can't imagine them protesting anywhere outside the proposed area, so I imagine it will be entirely successful. There will be nothing to stop the protestors from praying for women's minds to be changed, or from handing out anti-abortion leaflets anywhere other than the front gates of the clinic where women have gone to make that choice."*

*"I passionately believe that women and girls have the right to visit these places without harassment or fear of retribution. Having been there myself this is not a decision taken lightly and the thought that it is currently ok for people who believe they are superior enough to make choices about people's lives they know nothing about and to harass and bully women at a really vulnerable time is barbaric. The zone will at least mean that the patients can focus on themselves and what is the best decision for them without being in further fear."*

Below is a selection of responses indicating that the proposals would not be useful:

*"I do not think that there is sufficient evidence of an "issue" and that therefore there is not a need to implement a PSPO here. In addition, even if it were useful- the scale of the PSPO is excessive and could have a detrimental effect on local charities, places of worship and residences ability to express their freedom of speech."*

*"I think it is a very heavy handed approach when an agreement could more easily be reached around a table. The Vigils are so infrequent - 1.5 hours a week at Streatham and probably less than that at Brixton .there is an annual procession at Streatham and a bi-annual procession at Brixton when there are more people but they are only there outside the abortion centre for an hour and a half. A PSPO would seem like a very disproportional response to such a limited activity!"*

*"It sets a dangerous precedent and could lead to Lambeth being characterised as undemocratic and heavy handed. The comments in evidence packs make it clear that the vigils are legal and there has been no need for Police action. While some commentators are "furious" or "disgusted" - individual feelings cannot be used to take away rights which are protected in UK and European law. "Disgusted of Tunbridge Wells" used to be a joke. Should "disgusted of Lambeth" be the standard for policy making? There is a strong reputational risk to Lambeth here."*

*"My own opinion as a private caring individual, is that women should have access to all the options available to them. In my opinion to have a PSPO will prevent these vulnerable clients from having knowledge of all the options. This cannot be right. I agree that vulnerable women should not be "harassed" at your gates. Equally I think to offer advice and help can only be a good thing for these poor women. In order to make an informed choice about this proposed step, it will be necessary to speak to the women who have been helped and supported by the pro-life members, which, I understand, has not happened yet. I'm sure the Good Counsel Network would be pleased to assist the process by giving information on those who, while approaching the clinics are actually not sure or definite that abortion is what they would choose were other help and support available."*

*"Removing freedom of speech will not help anyone. Removing the right to express people's religion is wrong. Removing the opportunity to debate will not help anyone. The proposed "prohibiting" map includes a number of churches, are you proposing that you should ban the churches from praying?"*

A thematic analysis has been conducted regarding the question **“Tell us how useful you think our proposed PSPO will be in dealing with this issue?”** This amounted to categorising all free text responses from respondents into regularly described themes. These themes are described below:

The themes regularly described by respondents who supported the proposals overall were:

- + A very positive, useful step
- + The PSPO will protect women from being harassed or intimidated when using these services
- + The PSPO will enable women to access legal health services without fear and exercise freedom of choice
- + Seems a proportionate and pragmatic measure
- + The PSPO should be trialled and reviewed
- + Usefulness will depend on how effectively it is implemented and enforced
- + Will impact positively on the local community
- + Stronger powers are needed to address activities

The themes regularly described by respondents who did not support the proposals overall were:

- + PSPO is unnecessary as nobody is being harmed or offended by this behaviour
- + Unreasonable and disproportionate response by council
- + Not useful as women will be prevented from receiving help and provided with alternative options
- + Dangerous to democracy/ people have the right to demonstrate/ infringement of civil liberties
- + PSPO will discriminate against pro-life campaigners
- + Not useful as PSPO may not stop people from gathering
- + PSPO should be applied to both pro-life vigil participants and pro-choice supporters

For those that answered that they did not think the proposals would be useful a follow-up question was asked: **“If you don’t think it will be useful, tell us what other powers or tools do you think would be more appropriate:”** Below are a selection of free text answers to this question:

*“Since there is a disconnect between what those gathering think they are doing and those experiencing harassment and distress, we think it would be most beneficial to mediate between two parties. We would be happy to facilitate this. Rather than legislating against behaviour in public, since the public space is shared, we think a better response would be to seek to help those gathering to understand the impact of their behaviour in causing distress and and to modify it so that freedom of gathering, belief and expression are preserved.”*

*“It make be useful to give those opposed to abortion another way to protest entirely physically separate so as not to damage/hurt/intimidate the women who are exercising their right to choose.”*

*“Lambeth Council should employ service that helps women to explore all alternatives when faced with crisis pregnancy.”*

*"Promoting genuine, open dialogue between LIFE groups and the abortion industry. The two sides are too polarised."*

*"I think people need to be confident that these clinics are genuinely giving adequate counselling to the women who come laying out all the options to them. It seems sensible that clinics are independently ofsteded to check if they are offering all the options available to these vulnerable women. A lot of people are uncomfortable that they might be encouraging women to abort their children knowing that they financially gain through that process. Those who share the leaflets seem to be concerned about the lack of openness and education on the subject. If there was a forum for openness about the reality of abortion in relation to child's development from a medical perspective and the reality that many women face post trauma and require counselling should be more widely known. Lambeth could specifically provide financial help for vulnerable women who are considering abortion only because of financial struggles."*

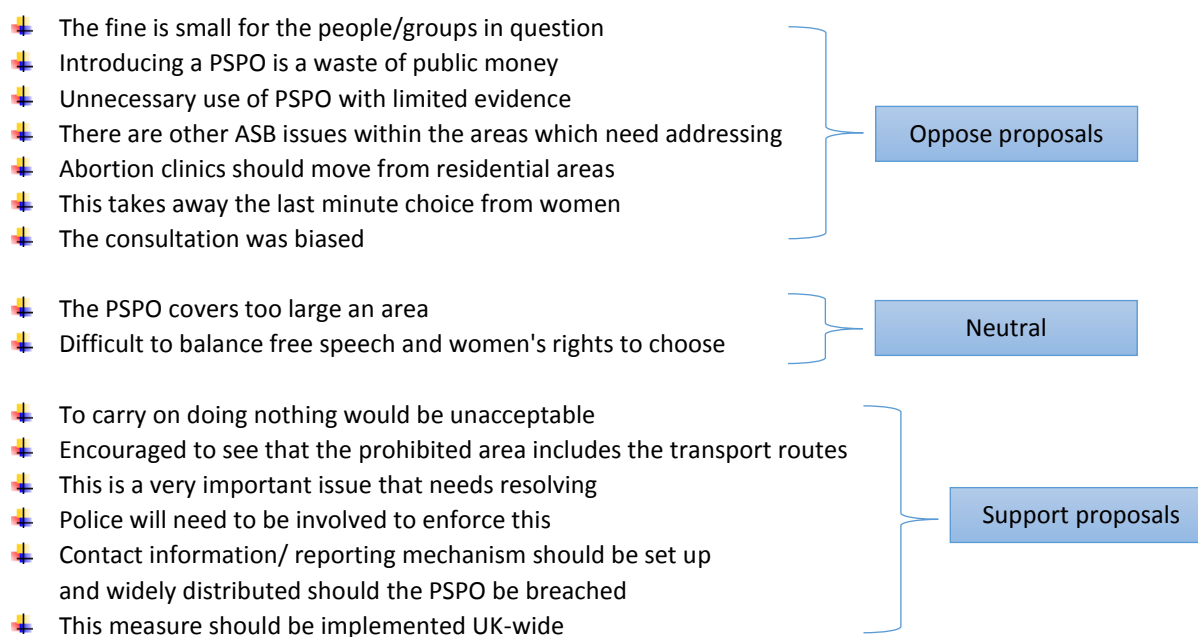
Below is the result of a thematic analysis of the responses to this question. A number of respondents suggested alternatives that the authority should consider:

- ✚ Try to reach an agreement with the groups/people responsible to modify their behaviour
- ✚ Allow demonstrations to take place in a designated space at certain points throughout the year
- ✚ Consider providing a specific service to deal with crisis pregnancies
- ✚ Abortion clinics and pro-life supporters should work together with genuine and open dialogue
- ✚ Improve public confidence in the counselling that is offered to women at the abortion clinics

The final question on the online survey asked respondents whether or not they had any additional comments: **"Please use the space below to make any other comments on our draft PSPO:"**

Many respondents had concerns regarding the size of the PSPO area, that it included residential properties and other unnecessary public locations such as churches. This issue will be addressed in the following section.

Overall 160 respondents had additional comments to make. A thematic analysis of these responses raised the following points:



## Online Survey: Engagement Behaviour and Demographics

In total, the 699 respondents' spent a total of 123 hours 48 minutes and 34 seconds completing the surveys. On average, this equates to just over 10 minutes per respondent with a median response time of 6 minutes 45 seconds. This indicates that half of respondents spent nearly 7 minutes completing the survey. This highlights a reasonable level of consideration per respondent, particularly when numerous questions on the survey were multiple choice. There were 42 respondents who spent longer than 30 minutes completing the survey.

The below graph highlights the daily number of engagements with the survey online during the course of the consultation.

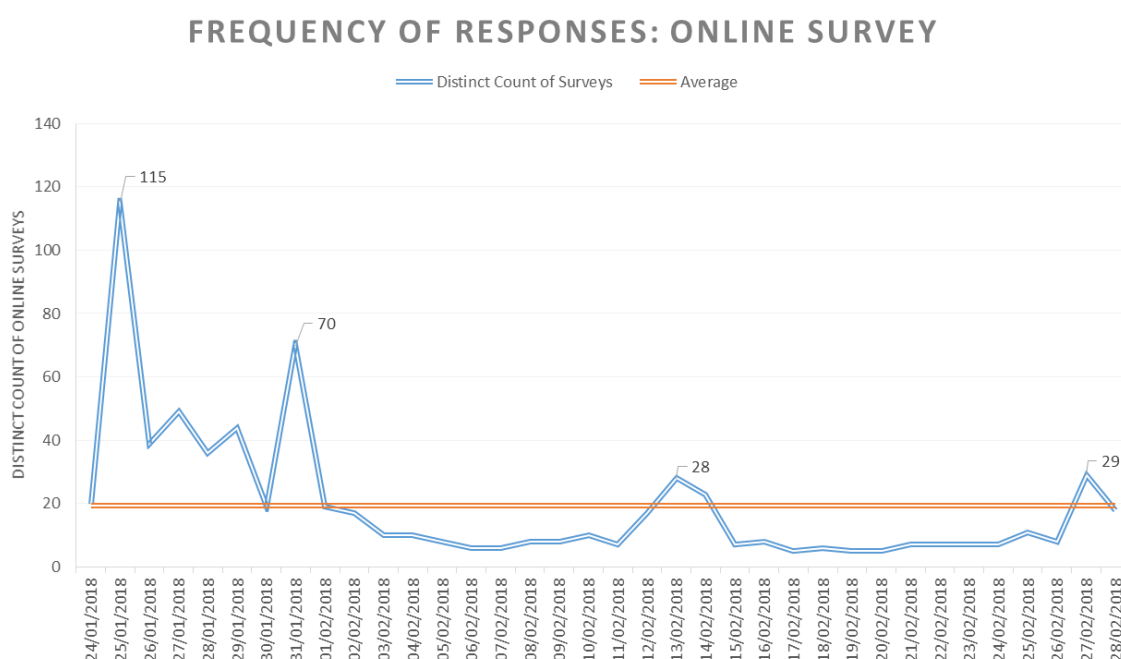


Figure 3: Showing the number of completed online surveys per day during the consultation

Figure 3 illustrates that during the first week that the consultation was open there were greater response rates reduced over time. Just after the mid-point and as the consultation drew to a close there were also slightly elevated response rates. Overall, the online survey averaged 19-20 responses per day.

The full report on the survey respondents' demographics, including the individual breakdown by category, can be found at Appendix C. The bulleted summary of the demographics are as follows:

- ✚ 72% of respondents were women (including transgender women)
- ✚ 86% of respondents were either white British, white Irish or from another white background
- ✚ 78% of respondents were aged between 25 and 54
- ✚ 57% of respondents were not religious or described themselves as Atheist
- ✚ 25% of respondents described themselves as Christian
- ✚ There was an even split of never married (44%) and married (43%) respondents
- ✚ 82% of respondents were in full or part time employment
- ✚ 8% of respondents were pregnant at the time of completing the survey
- ✚ 5% of respondents identified as having a disability
- ✚ 77% of respondents identified as being a Lambeth resident

## Email Responses

There were 1,506 distinct email responses to the consultation, of these; 1,453 oppose the Council's proposals. This equates to a 96.5% objection rate.

It is important to highlight at the outset that there was petition style stock email response which accounted for more than 1,300 emails. The vast majority of these emails were received on the last day of the consultation and included email addresses associated with other nations including; Poland, Germany and France. The distinction is that rather than receiving lots of different emails from individuals who are concerned about the proposals, the authority has received the same objection email lots of times, originating from an organisation specifically set up to oppose any PSPOs of this nature across the UK. The emails were sent in an organised fashion, the website <http://behereforme.org/> allows you to input your name, email address and phone number into a user form and send a pre-written email all from the homepage<sup>4</sup>. Many of the responses just contained the basic text that the organisation itself had written. It is the view of the authority, therefore, that many of these stock responses are unlikely to know the specific nature of the local issues in Lambeth. Further, there is no link on their homepage to the Lambeth consultation page or our initial evidence packs. For the purposes of the consultation, and after consideration of all the factors, this collective response should be treated accordingly by members.

The analysis currently identifies 1,348 emails that originated from [info@behereforme.org](mailto:info@behereforme.org) many of which include the instructions provided on the website that explain the types of comments to include. These were:

- ✚ Say if you pray outside the clinic/hospital and/or counsel women
- ✚ How often the vigil takes place and how often you attend
- ✚ Describe your personal experience of helping or witnessing a woman receiving help to keep her child. Include any testimony of that life-changing help. Describe any follow-up contact you may have had with women who kept their baby or those who did not
- ✚ Describe the peaceful, prayerful nature of the vigils
- ✚ Include your view on why it is essential that the vigils continue to take place, and what it would mean if buffer zones were implemented. Some points below may help you:

*"Women are not always certain that they want an abortion even though they are entering the clinic. Anne Furedi, the chief executive of BPAS, is on record admitting this. The hundreds of women helped by vigil attendees every year is proof of this."*

*"Abortion providers do not offer practical help for women who are unable to receive welfare from the state. Vigils often do. Such women would be helpless if vigils were banned"*

A copy of the full stock email can be found at Appendix D. The organisation utilised a website to facilitate this process and a screenshot of the homepage can be found at Appendix B.

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<sup>4</sup> A screenshot of the <http://behereforme.org/> (accessed on 07/03/2018) homepage can be seen in Appendix B

Further to this, there were at least 38 emails from addresses that have a domain name outside of the UK, these were:

- ✚ @wp.pl (11)
- ✚ @o2.pl (10)
- ✚ @op.pl (4)
- ✚ @interia.pl (3)
- ✚ @yahoo.fr (3)
- ✚ @poczta.fm (3)
- ✚ @yahoo.de (1)
- ✚ @tlen.pl (1)
- ✚ @gazeta.pl (1)
- ✚ @vp.pl (1)

The majority of the above domains originate from Poland, but there are examples of domains from France and Germany.

Based on the existence of the above, it is also possible that a proportion of the '.com' email addresses also originate from overseas. It is unlikely that respondents from outside of the UK know the specific details regarding the local issues that impact Lambeth and therefore this fact should be accounted for as part of the overall results.

The vast majority of emails received in the consultation came on the last day of the consultation, as is shown in Figure 3 below. When compared to the engagement behaviour of the online survey, distinct differences are obvious.

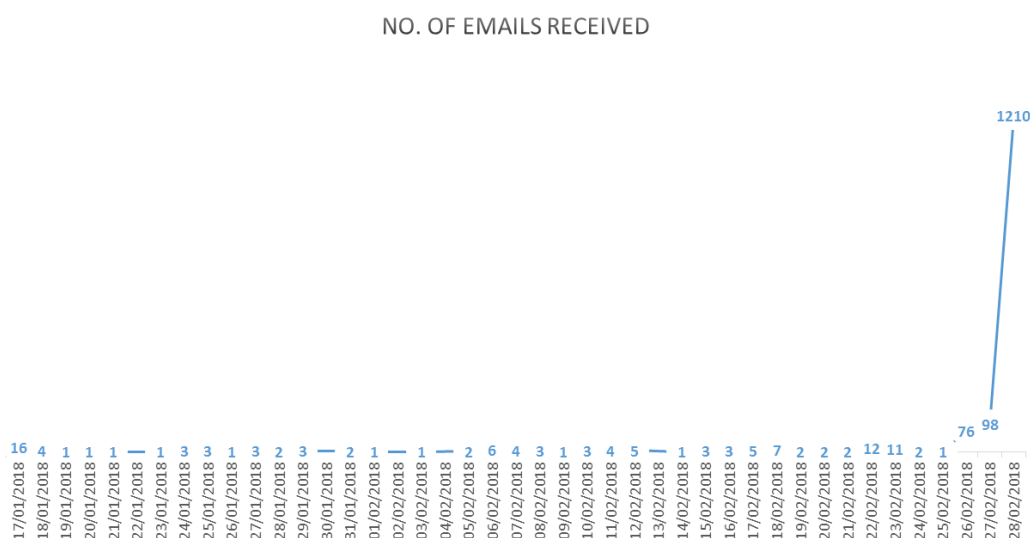


Figure 4: Showing the volume of emails received in the PSPO inbox by date

The above graph highlights the scale of the increase in responses as the consultation came to a close. During the last three days of consultation the PSPO inbox received 1,384 emails (92% of the total received), and of these; 1,332 were from [info@behereforme.org](mailto:info@behereforme.org). In total, [info@behereforme.org](mailto:info@behereforme.org) accounted for 90% of all of the email responses to the consultation.

When excluding the petition style responses, the volume of emails received over time is reflected in the below graph.

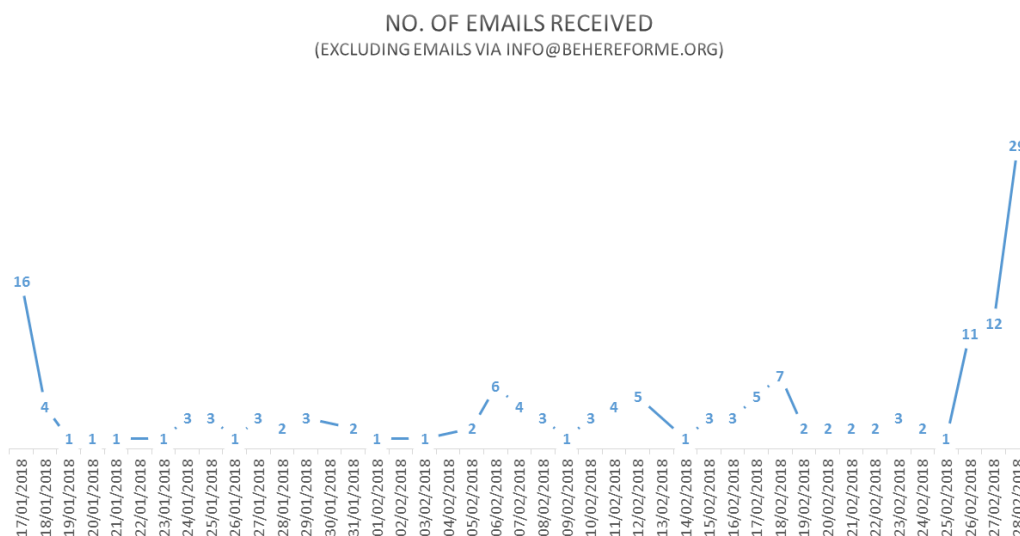


Figure 5: Showing the volume of emails received in the PSPO inbox by date (excluding info@behereforme.org responses)

The above graph shows a peak at the beginning and end of the consultation process. The above engagement behaviour more closely aligns with the engagement behaviour of the online survey.

Excluding [info@behereforme.org](mailto:info@behereforme.org) responses leaves 158 responses received independently. Two thirds of responses objected to the proposals as can be seen in the below graphic:

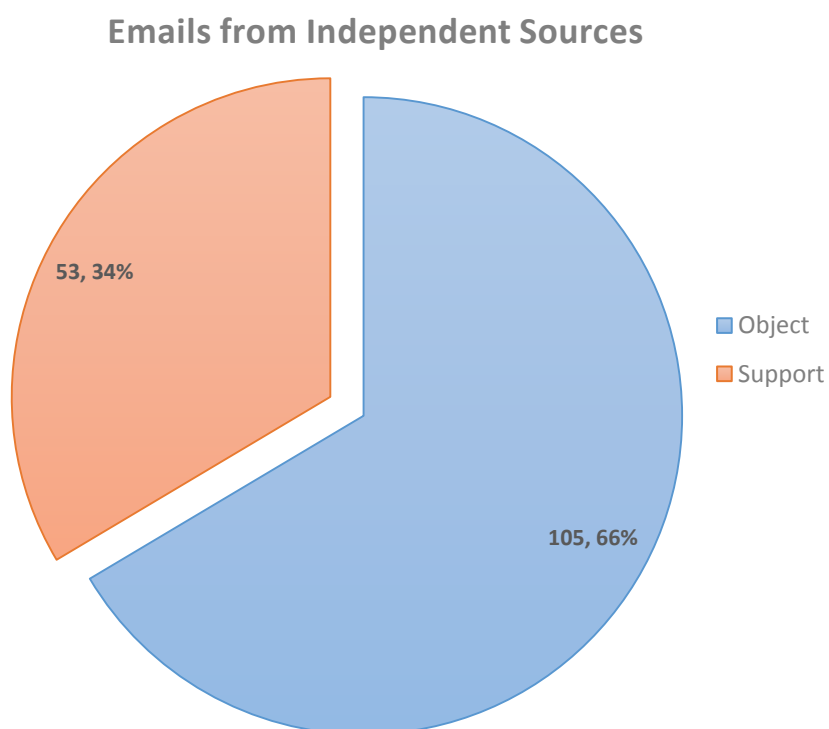


Figure 6: Support levels for proposals from independent email sources

Common themes from emails objecting to the proposals are as follows:

- ✚ People standing outside clinics are there to peacefully pray and offer help and support
- ✚ Many women have accepted the support and help outside the abortion clinics and would not have done so if the team were not friendly and approachable
- ✚ There has been no effort to contact the vigil groups to ask them about their activities, discuss any concerns and give them appropriate and proportional opportunity to present evidence
- ✚ There has been undue haste to pass this motion without proper consultation which has a pre-conceived outcome against vigil attendees and contains built-in bias
- ✚ The evidence packs are limited and mostly contain allegations of people praying and handing out leaflets
- ✚ Existing public order powers include local injunctions to prevent nuisance or annoyance, and include powers of arrest as well as criminal behaviour orders for problem individuals
- ✚ The area proposed is excessively large with the intention of excluding any possibility of pro-life members assisting pregnant women
- ✚ The proposal damages democracy and would prevent the legal expression of human rights such as; freedom of conscience, religion, assembly, expression and the right to receive information
- ✚ Legal experts and civil liberty organisations have criticised buffer zones for criminalising behaviours that would otherwise be legal
- ✚ Abortion providers are money-making businesses who do not offer women any real choice
- ✚ No pro-life campaigner has ever been charged or convicted of harassment

[awaiting legal clearance re acknowledgement of objections]

Common themes from emails expressing support for the proposals are as follows:

- ✚ If individuals or organisations object to procedures that are deemed legal, they should take their demonstrations to the authorities that instigate the laws and protest to their MPs for specific laws to be changed
- ✚ It is vital that women seeking the clinic's support and services can do so in a safe, protected, private and anonymous environment
- ✚ The people outside the clinics are trying to shame women and girls into submission and condone their beliefs and behaviour, that is not an act of freedom of speech
- ✚ Women should not have to face harassment to exercise their rights to make decisions about their own health
- ✚ The presence of protesters adds to the difficulties a woman is facing in a stressful and traumatic time
- ✚ Freedom of speech should not mean freedom to impose one's views on others, especially on those who are already vulnerable
- ✚ Anti-abortion protestors can still protest away from the immediate vicinity of the abortion clinics
- ✚ The decision to terminate a pregnancy is not taken lightly and women's personal choices should be respected
- ✚ The buffer zone would be an effective and simple solution to this unacceptable situation

As part of the consultation analysis a version of all of the email responses will be made available removing all personal and identifiable information (names, email addresses etc..). This will be made available as a separate document due to the volume of emails received.

## Letter Responses

The authority received four paper copy objections to the proposals, all of which are available in a separate appendices to this report. Due to the low number of responses via this method a full scale analysis, as with other sections, is not necessary.

The main themes from the letters are as follows:

- ✚ Pro-life vigils are there to offer help and alternatives to women
- ✚ No pro-lifers have been charged or convicted of harassment
- ✚ Pro-choice protestors are complaining simply because they disagree with the pro-life views
- ✚ Many women accept help from outside abortion clinics
- ✚ Vigils are prayerful, peaceful and quiet – no graphic imagery was displayed
- ✚ The imposition of a buffer zone is a clear violation of free speech

One of the letters was a testimony from a woman who had accepted help from the pro-life vigils who wished for her case to be known. She explains that she received counselling and financial support from the group and that it is important for the pro-life groups to be able to stand outside the clinics.

## Appendix A – Analysis of Survey Plan

Question	What does the question address?	How does it relate to the ASB, Policing and Crime Act 2014?
How many times have you had experienced this activity in the last 12 months?	Frequency of the activity.	Persistent and ongoing (s.59)
How many people were involved at any one time?	Scale of the activity.	Detrimental impact/ unreasonable behaviour (s.59)
Please describe your experience (if any) of the activity we propose to limit in the last 12 months (e.g. handing of leaflets, praying, speeches to passers-by, taking photographs, harassment, etc.)	Identifying the activities that are occurring in order to be able to effectively respond.	Detrimental impact/ unreasonable behaviour (s.59)
Please tell us how you were affected by the activity?	The impact on people in the locality.	Detrimental impact/ unreasonable behaviour (s.59)
If very reasonable or reasonable please tell us why?	The impact on people in the locality.	Pro-life perspective (appropriate consultees s.72)
If very unreasonable or unreasonable please tell us why?	The impact on people in the locality.	Pro-choice perspective (appropriate consultees s.72)
Tell us how useful you think our proposed PSPO will be in dealing with this issue?	Practicality of the order.	Appropriate Consultees (s.72)
If you don't think it will be useful, tell us what other powers or tools do you think would be more appropriate?	Practicality of the order.	Appropriate Consultees (s.72)
Please use the space below to make any other comments on our draft PSPO?	Additional comments from all perspectives.	Appropriate Consultees (s.72)

Appendix B – [www.behereforme.org](http://www.behereforme.org) Screenshot on 07/03/2018

[illegible]

## Appendix C – Demographics of all Respondents

Gender	Distinct Count of Surveys	Proportion of Total (%)
Woman (including trans woman)	505	72.2%
Man (including trans man)	148	21.2%
Prefer not to say	17	2.4%
Other gender identity	1	0.1%
(blank)	28	4.0%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Age Group	Distinct Count of Surveys	Proportion of Total (%)
Under 18	2	0.3%
18-24	26	3.7%
25-34	189	27.0%
35-44	211	30.2%
45-54	142	20.3%
55-64	81	11.6%
65-74	35	5.0%
75-84	2	0.3%
(blank)	11	1.6%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Ethnicity Category	Distinct Count of Surveys	Proportion of Total (%)
White: British	492	70.4%
Other White background	75	10.7%
White: Irish	31	4.4%
Prefer not to say	22	3.1%
Black or Black British: Caribbean	10	1.4%
Asian or Asian British: Indian	8	1.1%
Mixed: White and Black Caribbean	8	1.1%
Black or Black British: Other African background	6	0.9%
Mixed: White and Asian	6	0.9%
Mixed: White and Black African	5	0.7%
Other Ethnic Group	5	0.7%
Other mixed background	5	0.7%
Latin American	3	0.4%
White: Polish	3	0.4%
Asian or Asian British: Chinese	2	0.3%
White: Portuguese	2	0.3%
Arab	1	0.1%
Asian or Asian British: Bangladeshi	1	0.1%
Black or Black British: Other Black background	1	0.1%
Other Asian background	1	0.1%
(blank)	12	1.7%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Religion	Distinct Count of Surveys	Proportion of Total (%)
No religion	217	31.0%
Atheist	178	25.5%
Christian	176	25.2%
Prefer not to say/don't know	50	7.2%
Other - please specify	16	2.3%
Jewish	7	1.0%
Muslim	5	0.7%
Buddhist	2	0.3%
Hindu	1	0.1%
(blank)	47	6.7%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Relationship Status	Distinct Count of Surveys	Proportion of Total (%)
Never married and never registered a same-sex civil partnership	300	42.9%
Married	292	41.8%
Divorced	43	6.2%
Separated, but still legally married	9	1.3%
Widowed	4	0.6%
In a registered same-sex civil partnership	4	0.6%
Formerly in a same-sex civil partnership which is now legally dissolved	1	0.1%
(blank)	46	6.6%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Employment Status	Distinct Count of Surveys	Proportion of Total (%)
Employee in full-time job (>30 hours plus p/wk)	365	52.2%
Employee in part-time job (<30 hours p/wk)	87	12.4%
Self employed full-time	75	10.7%
Self employed part-time	46	6.6%
Wholly retired from work	36	5.2%
Looking after the home	20	2.9%
Full-time education at school, college or university	15	2.1%
Doing something else - please specify	13	1.9%
Unemployed and available for work	10	1.4%
Permanently sick/disabled	9	1.3%
Refused	2	0.3%
Don't know	1	0.1%
(blank)	20	2.9%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

Disability?	Distinct Count of UR	Proportion of Total (%)
No	643	92.0%
Yes	37	5.3%
(blank)	19	2.7%
<b>Total</b>	<b>699</b>	<b>100.0%</b>

## Appendix D – Full Copy of [info@behereforme.org](mailto:info@behereforme.org) Stock Email Response

*"Dear Jim Dickson & Mohammed Seedat,*

*I am writing to respond to your so-called consultation on 'protests' outside abortion clinics.*

*A consultation only in name*

*I am responding to this consultation by email as I believe that the online form is framed primarily to collect allegations and testimony against vigil attendees. It is not collecting substantiated evidence of wrongdoing. The 'consultation' is not framed to encourage a full response from the public about the merits and dangers of buffer zones. As such I believe this is not a proper consultation on the issue and I wish for such a view to be noted.*

*The title of the consultation itself suggests bias, and that the existing format is simply legitimising a pre-conceived conclusion. Besides, vigils have been branded as simply a 'protest' when in fact they are often a mixture of charitable outreach, expression of religious belief and the free assembly of citizens among many other things.*

*There have not been widespread calls for new powers from police or legal experts; instead, the consultation is the result of an effective BPAS lobbying effort, an organisation that would gain financially from the implementation of so-called 'buffer zones'.*

*Moreover, a national consultation on the prospect of such a draconian imposition that bans citizens from everyday activities should be the result of a proven 'problem', including substantiated evidence of criminal behaviour. I have not seen this evidence presented by campaigners nor by the Home Office itself.*

*Why buffer zones would be bad for society*

*In addition to the direct effect on women who rely on the help of vigils, I believe the implementation of national 'buffer zones' would be bad for society.*

*There are wide-ranging powers available for authorities to keep public order and protect the public from genuine harassment and intimidation. Such powers are already so wide-ranging and discretionary that civil rights campaigners have consistently criticised them.*

*Existing public order powers include local injunctions to prevent nuisance or annoyance, and include powers of arrest as well as criminal behaviour orders for problem individuals. There are wide powers to prosecute assault and harassment in the Criminal Justice Act 1998, Protection Against Harassment Act 1997 and in the Public Order Act 1986. The police also have powers of dispersal under the Anti-Social Behaviour Act 2014 and the Public Order Act 1986.*

*Having noted the existence of such wide-ranging powers, it would be an unnecessarily draconian measure to institute 'buffer zones'; this is especially the case given the lack of arrests, injunctions, and prosecutions of vigil attendees over decades of helping women.*

*Moreover, as civil rights groups have noted, the notion of 'buffer zones' is in direct contravention of the principle of 'minimal criminalisation'. This principle holds that the state shouldn't look to criminalise its citizens unnecessarily. I am deeply concerned that the state is looking to impose a 'one size fits all' approach to very particular circumstances all over the country. Furthermore, criminal charges should follow proven criminal behaviour, whereas 'buffer zones' risk criminalising thousands of citizens for otherwise legal actions.*

*So-called 'buffer zones' would violate many human rights all at once. The Human Rights Act 1998 guarantees the ability of all people to practise freedom of public assembly, freedom of speech freedom of religion, and freedom to share information. Buffer zones would compromise the exercise of those rights.*

*'Buffer zones' would also be bad for democracy too. The right of free assembly of citizens, freedom of speech and the right to protest would all be violated by 'buffer zones'. I agree with the judge in Handyside vs UK: "Freedom of expression ... is applicable not only to "information" or "ideas" that are favourably received or regarded as inoffensive or as a matter of indifference, but also to those that offend, shock or disturb the State or any sector of the population. Such are the demands of that pluralism, tolerance and broadmindedness without which there is no "democratic society".*

*I note that the government's recent policy announcements on the danger of safe spaces at universities would be contradicted by the introduction of 'buffer zones'.*

*In summary, I believe the proposal to introduce so-called buffer zones to be unconstitutional, bad for society, violating of human rights, damaging to charitable outreach and based on little or no substantiated evidence. I wholeheartedly reject the proposal to introduce 'buffer zones'.*

*Yours sincerely,"*